Sustainability Appraisal of the Cranbrook Plan - Publication Draft

February 2019

East Devon – an outstanding place

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1 Introduction to the Cranbrook Plan and this appraisal

1.1 This Sustainability Appraisal has been prepared by officers of East Devon District Council as part of an integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Publication draft of the Cranbrook Plan.

1.2 The appraisal is intended to be submitted, following consultation, as supporting documentation for the submission of the Cranbrook Plan for examination. This appraisal cross-reference back to previous stages of appraisal in plan production and to overall plan making work.

1.3 In preparing this appraisal East Devon District Council has employed the consultancy firm of LUC as a 'critical friend' to review the form, approach and content of the work and offer advice and guidance. The format of this appraisal is informed by a standard approach adopted by LUC but it is stressed that content and 'ownership' rests with East Devon District Council. LUC have been assisting East Devon District Council through previous stages of SA work on the Cranbrook Plan.

Cranbrook in summary

1.4 Cranbrook is a rapidly developing new town in East Devon. It will include employment land and other services and facilities alongside new housing. By the end of 2018 around 1,830 new homes (within the main area initially gaining planning permission) had been built and were occupied at Cranbrook. The East Devon Local Plan proposes the expansion of Cranbrook up to 2031 to accommodate around 7,800 new homes with the Cranbrook Plan setting out policy for development. This scale of development will make Cranbrook the second biggest town in East Devon, after Exmouth.

1.5 Cranbrook, on the basis of its current extent and at its nearest point, is located approximately 3 kilometres to the east of the Exeter City Council boundary and the M5 Motorway and just over one kilometre north of the main runway at Exeter Airport. The Exeter-Waterloo railway line runs along the northern boundary of Cranbrook.

The Cranbrook Plan - development plan document

1.6 This current stage of SA work forms a critique of the Publication draft of the Cranbrook Plan. Earlier appraisal work has considered earlier draft documents and consultation documents that have informed and led up to the publication stage of plan making. The Cranbrook Plan development plan document (DPD) will be a formal planning policy document that will guide future development of the new town, the DPD will be known as the 'Cranbrook Plan'. In having DPD status it will form part of the Development Plan for East Devon alongside the adopted East Devon Local Plan and the East Devon Villages Plan as well as Devon County Council waste and mineral plans.

1.7 The East Devon Local Plan was adopted in January 2016 and it sets out the broad framework for development across the whole of East Devon, including at Cranbrook; it

covers the period up to 2031. The Cranbrook Plan will provide more policy detail and allocate land for the future development of the town. It should be noted that in earlier work it was called the 'Cranbrook Development Plan'. In subsequent drafts, and in this work, reference to the term 'Development' have been dropped to make things simpler and the plan is now therefore referred to as the Cranbrook Plan.

The role of Sustainability Appraisal and Strategic Environmental Assessment

1.8 Sustainability Appraisal is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.

1.9 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive[1], transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)[2]. The purpose of SEA, as defined in Article 1 of the SEA Directive is '*to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans….with a view to promoting sustainable development'*. This assessment work has been produced under assumption of there being no legislative changes that impact on plan making procedures following the proposed withdrawal of the United Kingdom from the European Union.

1.10 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. National Planning Practice Guidance[3] shows how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA report that incorporates the requirements of the SEA Regulations. The SA/SEA of the Cranbrook Masterplan and subsequently the Cranbrook Plan is and will be prepared in line with this integrated approach and throughout this report the abbreviation 'SA' should be taken to refer to 'SA incorporating the requirements of SEA'.

Timetable for Cranbrook Plan production and for SA work

1.11 The timetable for key stages of Cranbrook Plan production and for stages of SA work are set out in the summary table below and more significant stages are referred to in more detail in this chapter and elsewhere in this report. Dates, from early 2019 onward, which are shaded, are projected. It should be noted that this timetable varies from the Councils Local Development Scheme adopted in July 2018 – see: http://eastdevon.gov.uk/media/2550925/lds-at-summer-2018-ver-02.pdf

[1] SEA Directive 2001/42/EC
[2] Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.
[3] http://planningguidance.planningportal.gov.uk/

Table 1.1 – Key timetabled stages in Cranbrook Plan production

Date	Cranbrook Plan Making Stages and other key events	SA stage and commentary
June 2015	Decision, in principle, taken to prepare the Cranbrook Plan.	There was no SA work at this stage.
2015	Consultants first commissioned to produce a Cranbrook Masterplan.	There was no SA work at this stage.
July to August 2015	Regulation 18 Consultation.	There was no SA work at this stage.
January 2016	East Devon Local Plan adopted – this committed to production of the Cranbrook Plan.	There was a full SA of the Local Plan.
June to July 2016	Cranbrook Plan Issues and Options report consulted on.	This issues and Options Report was subject to an SA report that evaluated alternative options.
November 2017	Cranbrook Plan Preferred Approach incorporating the Masterplan, including an SA, were consulted on.	An SA report was published for comment alongside the Preferred Approach document.
Through 2018	Feedback from consultation and further evidence used to inform the Cranbrook Plan.	Ongoing SA work and consultation feedback used to inform the publication of Cranbrook Plan and its policy.
Spring 2019	Publication of the Cranbrook Plan (with proposed six weeks consultation).	This SA report of the Cranbrook Plan is to be published for consultation.
Summer 2019	Cranbrook Plan Submission.	This SA document will form part of the submission.
Autumn 2019	Examination Hearing Sessions.	SA documents will form part of the examination.
Later in 2019/early 2020	Cranbrook Plan Adoption.	A full final SA report will accompany plan adoption.

The Cranbrook Masterplan and early stages work

1.12 In 2014 East Devon District Council started an evaluation of the early stages of Cranbrook development with a view to learning lessons for the future. It was identified that the town would benefit from comprehensive planning and in 2015 consultants were invited to tender for production of a masterplan for the town. The consultancy firm of Savills were appointed to undertake the work, though at appointment it was not specifically envisaged that this would lead on to production of a DPD.

1.13 The first stages of masterplan work involved evidence gathering and stakeholder engagement, specifically including a series of stakeholder workshops and technical meetings. These helped narrow down a list of priorities for Cranbrook and to identify reasonable options for the Plan. The initial phases of work by Savills stretched from 2015 into 2016.

1.14 A version of the Masterplan, the final outputs from Savills, was completed in October 2017 and comprises of an overarching plan for the new town and supporting text that set out a spatial picture for the future development of Cranbrook. It should be noted that the 2017

version of the plan has now been updated by officers of East Devon District Council to form an amended 2019 version.

Initial (Regulation 18) Cranbrook Plan consultation

1.15 The first formal stage of preparing the Cranbrook Plan (the DPD) (under Regulation 18 of the plan making regulations) took place in June 2015. East Devon District Council consulted organisations and individuals that may have an interest in the future of Cranbrook development. The consultation outlined what the Cranbrook Plan may cover and sought views on any alternative or additional issues that should be addressed. **Appendix 1** of this appraisal provides details of the matters raised at this consultation and a summary of comments received.

Scoping letter for the Cranbrook Plan

1.16 The SA process began in September 2015 with the production of a Scoping Letter for the Cranbrook Plan. **Chapter 2** of this report provides specific commentary on this stage of work. **Chapter 3** of this document reports on the stages of work that followed the scoping

Cranbrook Issues and Options consultation report 2016 and its SA

1.17 In June and July 2016 the Council issued a Cranbrook Issues and Option report for consultation. This can be viewed at: http://eastdevon.gov.uk/media/2218860/cranbrook-io-160609-final-lr.pdf

1.18 The Issues and Options document set out an overall Vision and Strategic Objectives and outlined issues that could affect the development of a sustainable new town at Cranbrook. Although the Issues and Options report did not present specific detailed options for addressing those issues it did allude to some high level alternative approaches that could be taken forward in the Plan. The Issues and Options report also set out four alternative scenarios (essentially diagrammatic plans for possible future development areas with differing densities) which relate to the spatial development of the town.

1.19 An SA report was produced in support of the Issues and Options report. **Chapter 4** of this report provides details of the SA of the Issues and Options Report and also of consultation feedback.

Cranbrook Masterplan/Preferred Approach document and SA consultation in 2017

1.20 In November 2017 the Cranbrook masterplan and schedule of proposed policy matters for inclusion in a DPD were subject to consultation. This consultation was badged as the Cranbrook Plan preferred approach consultation 2017/18. There was also an SA of the preferred approach (of the two documents) that was subject to consultation. The preferred approach consultation ran from 10 November 2017 to 8 January 2018. Feedback from consultation helped inform the publication draft of the Cranbrook plan along with the SA of the publication draft.

1.21 **Chapter 5** of this report provides details of the SA at the preferred approach stage of plan making.

The Cranbrook Masterplan at January 2019

1.22 There is a new version of the Cranbrook Masterplan. In response to previous comments received and further evidence gathering the Council has revised and reviewed the masterplan. The changes made are minor in respect of in-principle considerations (essentially the written descriptive text) that informs the subsequent proposed layout. There are, however, a number of more significant changes in respect to the actual mapped layout proposals. In respect of its relationship with the Cranbrook Plan DPD the Masterplan;

- Forms a technical evidence document to show how the development of Cranbrook could proceed in a manner that would be compatible with the policy of the Cranbrook Plan; and
- Has informed specific land allocations in the Cranbrook Plan as shown on the Cranbrook Policies plan. In this respect there are some land uses shown on the Masterplan that have boundaries in the Masterplan that are directly translated and put on to the Cranbrook Plan policies map.

1.23 The previous version of the Masterplan was subject to SA and in **Chapter 6** and **Chapter 7** of this appraisal the new, 2019 draft, is also subject to SA.

Publication of the Cranbrook Plan and associated SA at January 2019

1.24 Feedback received from earlier stages of plan making work, specifically at the preferred approach stage, has helped inform the publication draft of the Cranbrook plan. The Cranbrook Plan forms part of the overall development plan for East Devon. There is already an adopted East Devon Local Plan that covers the whole of the District. The Local Plan has broad policy coverage to provide for growth and development at Cranbrook. The Cranbrook Plan adds considerable extra detail to the Local Plan and allocates additional land to accommodate the planned growth identified in the Local Plan.

1.25 The Cranbrook Plan has been prepared against a background of the fact that parts of Cranbrook have already been built, and there are existing planning permissions that allow Cranbrook to expand from its current total of around 1,800 homes, at the end of 2018, to just over 3,500 homes. The Cranbrook Plan adds further detail and guidance that can support existing permissions but more importantly also sets out how and where further expansion of the town, beyond the current permissions, should occur.

1.26 The Cranbrook Plan also includes policies for the Town Centre of Cranbrook and indicates where applications/changes to what is already permitted or existing may be positively encouraged and supported to assist delivery of a healthy sustainable new town.

1.27 As well as considering the Masterplan this appraisal report is, more importantly, concerned with specific assessment of the policies in the publication draft of the Cranbrook Plan. The Cranbrook Plan at this Publication stage includes a series of objectives that are subject to appraisal in **Chapter 8** of this assessment. Specific policy wording of the Publication of the

Cranbrook Plan is then subject to appraisal in **Chapter 9** of this appraisal and this chapter links to **Chapter 10** in this appraisal that evaluates alternative site development options.

1.28 The penultimate chapter of this appraisal, **Chapter 11**, addresses Monitoring and a suggested approach that should be taken to monitoring the likely significant effects of the Cranbrook Plan and proposed monitoring indicators. The final chapter of this appraisal, **Chapter 12**, sets out Conclusions and Next Steps. It summarises the key findings from the SA and describes the next steps to be undertaken in the preparation of the Cranbrook Plan and the SA.

Requirements of the SEA regulations

1.29 A particular importance of the SA is that it meets SEA requirements. **Table 1.2** below signposts where the requirements of the SEA Regulations have been met within this SA report.

Table 1.2: Requirements of the SEA Regulations and where addressed in this SA Report

SEA Regulation Requirements	Where covered in this SA report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Reg. 12 and Schedule 2):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes	Chapter 1
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Chapter 3
c) The environmental characteristics of areas likely to be significantly affected	Chapter 3
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapter 3
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation	Chapter 3
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects (see note after the this table for an explanation of the terms)	Chapters 6 to 9

SEA Regulation Requirements	Where covered in this SA report
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapters 6 to 9
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 to 10
i) A description of measures envisaged concerning monitoring in accordance with Reg. 17.;	Chapter 11
j) a non-technical summary of the information provided under the above headings	A separate non-technical summary document has be prepared to accompany the SA report for the Publication version of the Cranbrook Plan.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment Reg. 12(3).	Addressed throughout this SA report.
Consultation: • authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report Reg.12(5).	A Scoping consultation for the SA of the Cranbrook Plan was undertaken between September 2015 and October 2015.
• authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme Reg. 13.	Early consultation work was undertaken. The publication consultation document is accompanied by this SA report.
• other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country Reg. 14.	Not applicable
Taking the environmental report and the results of the consultations into account in decision-making Reg.16	

SEA Regulation Requirements	Where covered in this SA report
Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed: - the plan or programme as adopted - a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the consultation opinions expressed and the results of consultations entered into pursuant to Art. 7 have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and - the measures decided concerning monitoring	To be addressed after the Cranbrook Plan is adopted in a separate SEA/SA Adoption Statement.
Monitoring of the significant environmental effects of the plan's or programme's implementation Reg. 17.	To be addressed after the Cranbrook Plan is adopted.
Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive.	This report has been produced in line with current guidance and good practice for SEA/SA and this table demonstrates where the requirements of the SEA Directive have been met.

Note on item f) - by way of definition terms used can be interpreted as:

- **Secondary** – are impacts that are not a direct consequence or product of an action or policy but are outputs that arrive indirectly;
- **Cumulative** – are the summation of impacts from a number of actions or policies;
- **Synergistic** – are results where two or more policies or actions interact with one another to generate impacts;
- **short term** – whilst not defined in this work with reference to specific time periods these are impacts that occur quickly – frequently they will be temporary;.
- **medium term** – these are somewhat longer term impacts.
- **long-term term** – these are impacts that occur over a long time period and which will frequently be permanent;
- **permanent** - impacts that are around for a long time;
- **temporary** – impacts that do not last for a long time
- **positive** – where the impacts have desirable outcomes; and
- **negative –** where the impacts have undesirable outcomes

1.30 The above terms are used throughout this report to describe the nature of impacts though the most specific comment is made in respect of **direct impacts** (impacts that can be expected to result explicitly and directly as a consequence of implementation of policy or approach). There is also clear commentary in respect of cumulative and synergistic impacts (to some degree these terms will pick up on secondary impacts and many secondary impacts are of an in-combination nature). Most impacts are noted in this assessment to be long-term and permanent in nature.

1.31 The main body of the SA report is supported by the following appendices:

- **Appendix 1** – provides details of the Regulation 18 consultation that formed the starting point of plan making.
- **Appendix 2** - lists the comments that were received during the Scoping consultation and describes how each one has been addressed in the SA work undertaken since then.
- **Appendix 3** – provides an assessment of net residential density levels built at Cranbrook at summer 2017.

Links to and availability of technical evidence

1.32 In this SA work there are direct specific web links to some technical evidence and background papers. Other documents referred to can be found on the Council web site at:

http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-preferred-approach-evidence-base

2 Methodology

2.1 In addition to complying with legal requirements, the approach being taken to the SA of the Cranbrook Plan is based on current best practice and the guidance on SA/SEA set out in the National Planning Practice Guidance, which involves carrying out SA as an integral part of the plan-making process.

Stages in plan making and SA

2.2 **Table 2.1** below sets out the main stages of the plan-making process and shows how these correspond to the SA process.

Table 2.1: Corresponding stages in plan making and SA

Local Plan Step 1: Evidence Gathering and engagement
SA stages and tasks
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope • 1: Identifying other relevant policies, plans and programmes, and sustainability objectives • 2: Collecting baseline information • 3: Identifying sustainability issues and problems • 4: Developing the SA framework • 5: Consulting on the scope of the SA
Local Plan Step 2: Production
SA stages and tasks
Stage B: Developing and refining options and assessing effects • 1: Testing the Plan objectives against the SA framework • 2: Developing the Plan options • 3: Evaluating the effects of the Plan • 4: Considering ways of mitigating adverse effects and maximising beneficial effects • 5: Proposing measures to monitor the significant effects of implementing the Plans
Stage C: Preparing the Sustainability Appraisal Report • 1: Preparing the SA Report
Stage D: Seek representations on the Plan and the Sustainability Appraisal Report • 1: Public participation on Plan and the SA Report • 2(i): Appraising significant changes
Local Plan Step 3: Examination
SA stages and tasks
• 2(ii): Appraising significant changes resulting from representations
Local Plan Step 4 & 5: Adoption and Monitoring
SA stages and tasks
• 3: Making decisions and providing information
Stage E: Monitoring the significant effects of implementing the Plan • 1: Finalising aims and methods for monitoring • 2: Responding to adverse effects

2.3 The methodology set out below describes the approach that has been taken to the SA of the Cranbrook Plan to date and provides information on the subsequent stages of the process. Where appropriate the SA of the Cranbrook Plan is drawing from the SA/SEA work that has been carried out over the last few years in relation to the East Devon Local Plan.

Stage A: Scoping

2.4 The SA process began in September 2015 with the production of a Scoping Letter for the Cranbrook Plan. Given the narrow scope of the Cranbrook Plan, plus the fact that a detailed SA Scoping consultation had already been undertaken for the East Devon Local Plan, LUC, in agreement with East Devon District Council, prepared a consultation Scoping letter[4] instead of a full Scoping Report. The letter set out the scope of the SA work that would be undertaken for the Cranbrook Plan and was sent to the statutory environmental bodies (these are - Natural England, Historic England and the Environment Agency) for comment.

2.5 The Scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The SA Scoping letter for the Cranbrook Plan presented the outputs of the following tasks:

- Policies, plans and programmes of relevance to the Cranbrook Plan, and which shape the policy context for its development, were identified and the relationships between them were considered. This included policies from the East Devon Local Plan. This process enables any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed.
- Baseline information was collected on environmental, social and economic issues of relevance to the Cranbrook Plan area, drawing on the information that was collated and regularly updated throughout the SA of the East Devon Local Plan. This baseline information provides the basis for predicting and monitoring the likely effects of the Cranbrook Plan and helps to identify alternative ways of dealing with any adverse effects identified.
- Key sustainability issues for the Cranbrook area were identified, drawing from those identified in the East Devon Local Plan SA where relevant.
- The Sustainability Appraisal framework that was used in the SA of the East Devon Local Plan was presented, comprising the SA objectives against which options and subsequently policies would be appraised. It was considered appropriate to make use of this SA framework rather than developing a new framework as those objectives have been designed to address the key sustainability issues facing East Devon District, which are also relevant at the local level for Cranbrook. The SA framework provides a way in which the sustainability impacts of implementing a particular plan can be described, analysed and compared. It sets out a series of sustainability objectives that define long-term aspirations for Cranbrook and East Devon with regard to social, economic and environmental considerations. During

[4] http://eastdevon.gov.uk/media/1321611/cranbrook-sea-scoping-letter.pdf

the SA, the performance of the Cranbrook Plan options and policies are assessed against these SA objectives.

- The SA Scoping letter also included details of the proposed assessment methodology for the Cranbrook Plan, drawing on the methodology used previously for the SA of the East Devon Local Plan. Details of the proposed structure of the SA Report and next steps in the SA and Plan-preparation process were also provided.

2.6 Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development. The SA Scoping letter for the Cranbrook Plan was published in September 2015 for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and Historic England) as well as other interested parties.

2.7 **Appendix 2** lists the comments that were received during the SA Scoping consultation and describes how each one has been addressed in the SA work undertaken since then. In light of the comments received a number of amendments have been made to the review of plans, policies and programmes, the baseline information and the key sustainability issues (see **Chapter 3**), and the SA report will continue to be updated as necessary at each stage of the process to ensure that it reflects the current situation in Cranbrook and takes account of the most recent sources of information. A number of consultation comments were also received from consultees in relation to the SA framework and those have been addressed as appropriate, as described in **Appendix 2**.

Sustainability objectives used in the appraisal

2.8 Sustainability objectives are identified as overarching outcomes sought in terms of achieving sustainable forms or patterns of development. The SA objectives cover the social, environmental and economic aspects of sustainable development and for the Cranbrook Plan the objectives are the same as those used in East Devon Local Plan production.

2.9 **Table 2.2** overleaf presents the SA framework for the Cranbrook Plan which includes 20 headline SA objectives, as well as showing how all of the 'SEA topics' have been covered by the SA objectives. One small change was been made to the SA framework following the Scoping consultation (see response to National Trust submission) - this relates to SA objective 8 which now refers to the need to consider effects on the setting of cultural heritage assets (as described in **Appendix 2**). SA objective 19 advises - To maintain and enhance the vitality and viability of the Towns of East Devon. Cranbrook is a town and in the appraisal work consideration has focussed on whether the policy approach will support Cranbrook overall but especially the role and function of the town centre and neighbourhood centres.

Table 2.2: SA framework for the Cranbrook Plan

SA Objectives		Relevant Topic(s) covered, as set out in the SEA Regulations
1.	To ensure everybody has the opportunity to live in a decent home.	Population, human health, material assets.
2.	To ensure that all groups of the population have access to community services.	Population, human health, material assets.
3.	To provide for education, skills and lifelong learning	Population, material assets.
4.	To improve the population's health	Population, human health.
5.	To reduce crime and fear of crime.	Population, human health.
6.	To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	Population, human health.
7.	To maintain and improve cultural, social and leisure provision.	Population, material assets.
8.	To maintain and enhance built and historic assets and their settings.	Cultural heritage including architectural and archaeological heritage.
9.	To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	Soil, landscape.
10.	To maintain the local amenity, quality and character of the local environment.	Fauna, flora, soil, water, air, landscape.
11.	To conserve and enhance the biodiversity of East Devon.	Biodiversity, fauna, flora.
12.	To promote and encourage non-car based modes of transport and reduce journey lengths.	Human health, air.
13.	To maintain and enhance the environment in terms of air, soil and water quality.	Soil, water, air.
14.	To contribute towards a reduction in local emissions of greenhouse gases.	Air, climatic factors.
15.	To ensure that there is no increase in the risk of flooding.	Water, human health, material assets.
16.	To ensure energy consumption is as efficient as possible.	Climatic factors.
17.	To promote wise use of waste resources whilst reducing waste production and disposal.	Material assets.
18.	To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	Population, material assets.
19.	To maintain and enhance the vitality and viability of the Towns of East Devon.	Population, material assets.
20.	To encourage and accommodate both indigenous and inward investment.	Population, material assets.

SA Stage B: Developing and refining options in a plan and assessing effects

2.10 Developing options for a plan is an iterative process, usually involving a number of consultations with public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.

2.11 Regulation 12 (2) of the SEA Regulations requires that:

"The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—

(a) implementing the plan or programme; and

(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme."

2.12 It should be noted that any alternatives considered need to be 'reasonable'. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or development site options that are unavailable or undeliverable.

2.13 It also needs to be recognised that the SA/SEA findings are not the only factors taken into account when determining which options to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on sustainability performance in order to select an option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting options for a plan. In the case of the Cranbrook Plan, broad conformity with the East Devon Local Plan is also appropriate, however, it should be noted that plan making regulations[5] clearly recognise that policies can be included in new plans that supersede those in plans that have gone before.

2.14 Throughput this report are references, through various stages of work, on how options have been developed and appraised and as a result refined.

SA Stage C: Preparing the Sustainability Appraisal report

2.15 This SA report majors on work appraising the Cranbrook Plan publication document but also describes and summarises earlier stages of work. It sets out the findings of the appraisal of options, highlighting any likely significant effects, both positive and negative, taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects.

SA Stage D: Consultation on the Cranbrook Plan and this SA report

2.16 East Devon District Council is inviting comments on the Cranbrook Plan and this SA Report. Both documents are being published on the Council's website.

SA Stage E: Monitoring implementation of the Cranbrook Plan

2.17 Recommendations for monitoring the social, environmental and economic effects of implementing the Cranbrook Plan are presented this appraisal.

[5] The Town and Country Planning (Local Planning) (England) Regulations 2012, see: http://www.legislation.gov.uk/uksi/2012/767/pdfs/uksi_20120767_en.pdf in Regulation 8, item 5, states that: *"(5) Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy."*

Appraisal methodology

2.18 The reasonable alternative options for the Cranbrook Plan (and earlier appraisal work that has led to the publication draft) have been appraised against the SA objectives in the SA framework (the same framework has been used for earlier stages of SA work). Scores have been attributed to strategy and policy choices and alternative option to indicate likely sustainability effects.

Key to symbols and colour coding used in the SA of the Cranbrook Plan

++	The option or policy is likely to have a **significant positive** effect on the SA objective(s).
++/-	The option or policy is likely to have a mixture of **significant positive** and **minor negative** effects on the SA objective(s).
+	The option or policy is likely to have a **positive** effect on the SA objective(s).
0	The option or policy is likely to have a **negligible** or no effect on the SA objective(s).
-	The option or policy is likely to have a **negative** effect on the SA objective(s).
--/+	The option or policy is likely to have a mixture of **significant negative** and **minor positive** effects on the SA objective(s).
--	The option or policy is likely to have a **significant negative** effect on the SA objective(s).
?	It is **uncertain** what effect the option or policy will have on the SA objective(s), due to a lack of data.
+/- or ++/--	The option or policy is likely to have an equal mixture of **both minor or both significant positive and negative** effects on the SA objective(s).

2.19 Where a potential positive or negative effect is uncertain, a question mark may be added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (e.g. green, yellow, orange, etc.).

2.20 The likely effects of the options need to be determined and their significance assessed, and this inevitably requires a series of judgments to be made. This appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is, however, often quite small. Where either (++) or (- -) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable impact taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.

Difficulties encountered in the SA work

2.21 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process. At earlier stages of plan making the greatest challenges related to the fact that there were not specific policies to

assess; rather assessment was based around somewhat more conceptual ideas and principles and to some degree, specifically at the preferred approach stage of plan making, on assumptions made around the form that subsequent policy may take. There were, therefore, unknowns and many matters of detail that are now only clearer at the Publication stage of plan making. However even at this stage there are unknowns in respect of how a given policy may be applied at the decision stage and how it may be implemented in practice.

2.22 It should be noted that Grade 3 agricultural land comprises both Grade 3a and Grade 3b agricultural land. Only Grade 3a agricultural land, which covers about 21% of England's farmland, falls into the classification of best and most versatile agricultural land. The NPPF advises that planning authorities should seek to use areas of poorer quality land for development in preference to that of a high quality. The breakdown between Grade 3a and Grade 3b agricultural land is not available for the Cranbrook area, and therefore under the precautionary principle it is assumed that Grade 3 land has the potential to be best and most versatile agricultural land.

3 Sustainability Context for Development at Cranbrook

3.1 This chapter presents the review of relevant plans, policies and programmes and baseline information for Cranbrook, which together provide the sustainability context for the preparation of the Cranbrook Plan. At the end of the chapter the key sustainability issues for Cranbrook are identified.

3.2 A number of amendments have been made to the information in this chapter since it was originally presented in the September 2015 SA Scoping letter. Changes have been made in light of consultation comments received during the Scoping consultation and to update the information drawing on the most recently published evidence sources.

Review of plans, policies and programmes

3.3 The Cranbrook Plan is not being prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies, such as those relating to social policy, culture and heritage. It must also conform to environmental protection legislation and the sustainability objectives established at the international, national and regional levels.

3.4 Schedule 2 of the SEA Regulations requires the SA report to include:

> *(1) "an outline of the…relationship with other relevant plans or programmes"; and*
>
> *(5) "the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation"*

3.5 It is necessary to identify the relationships between the Cranbrook Plan and the relevant plans, policies and programmes so that any potential links can be built upon and any inconsistencies and constraints addressed.

3.6 There are a wide range of relevant plans, policies and programmes that shape the policy context in which the Cranbrook Plan is being prepared. These have been reviewed in detail as part of the SA of the East Devon Local Plan, and the most relevant for the Cranbrook Plan specifically are summarised below.

International Directives

3.7 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the emerging Cranbrook Plan. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects

(including on European-level nature conservation designations) are identified and can be mitigated.

3.8 There are a wide range of other relevant EU Directives, such as the Water Framework Directive 2000, which seeks to protect inland surface waters, transitional waters, coastal waters and groundwater, most of which have been transposed into UK law through national-level policy, and in particular the NPPF.

National Policy

3.9 The Cranbrook Plan must be in line with national policy as set out in the NPPF and its accompanying National Planning Practice Guidance, and also should be broadly in conformity with the adopted East Devon Local Plan. The East Devon Local Plan and the adopted East Devon Villages Plan (albeit the villages plan does not impact on Cranbrook) were prepared under the previous NPPF. The policies of these plans are **not** identified as being in conflict with the new NPPF and between the two plans they provide a full suite of policies applicable to decision making in East Devon; albeit the local plan does not go into detailed policy provision for Cranbrook and it does advises of production of the Cranbrook Plan. The Local Plan, amongst other matters, sets out that the Cranbrook Plan will allocate additional land for development.

3.10 **The National Planning Policy Framework (NPPF)**[6] is the most significant national policy document that must inform the Cranbrook Plan. The revised draft of the NPPF was adopted in July 2018. It sets out the Government's planning policy for England and how these policies should be applied. The Cranbrook Plan must be consistent with the NPPF requirements. The NPPF sets out information about the purposes of local plan-making, stating that:

> *"Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area … So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development"."*

3.11 The presumption in favour of sustainable development is to be given priority in plan-making and in the decision making process. Specific to the plan-making process this will mean that:

> *"a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
>
> *b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas , unless:*
>
> *i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*

[6] Ministry of Housing, Communities and Local Government (July 2018) *National Planning Policy Framework*

ii any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

3.12 In addition to contributing to the achievement of sustainable development the NPPF also requires plans to be prepared positively in a way that is 'aspirational but deliverable'. This means that opportunities for appropriate development should be identified in order to achieve net gains across the three overarching objectives of sustainable development: that is to say achieving the economic, social and environmental objectives of the planning system. Significant adverse impacts on these objectives should be avoided however and, where possible, alternative options which reduce or eliminate these types of impacts should be taken forward. Where this is not possible mitigation followed by compensatory measures should be pursued.

3.13 National policy within the NPPF of most relevance to the emerging Cranbrook Plan has been summarised below.

NPPF - Population Growth, Health and Wellbeing

3.14 The **NPPF** includes as part of its social objective the promotion of "*strong, vibrant and healthy communities*" by:

- *"ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and*
- *by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being."*

3.15 Ultimately planning policies and planning decision making should "*aim to achieve healthy, inclusive and safe places*".

3.16 The document states that strategic policies should set out the pattern, scale and quality of development and make sufficient provision for *"housing (including affordable housing) … [as well as] community facilities (such as health, education and cultural infrastructure)."* Policies should reflect "*the size, type and tenure of housing needed".* This policy approach is to include but should not be limited to housing requirements relating to affordable homes, families with children, older people, students, people with disabilities, service families, travellers, those who rent their homes and people wishing to commission the construction of their own homes. At major developments providing new housing planning policies and decisions should expect at least 10% of new provision to be delivered for affordable home ownership subject to conditions and exemptions.

3.17 To help to diversify opportunities for builders, promote a better mix of site sizes and increase the number of schemes that can be built-out quickly to meet housing need, the NPPF states that at least 10% of the sites allocated for housing through a local authority's plan should be half a hectare or smaller.

3.18 Where there is an identified need, development of sites not already allocated for housing to provide entry-level homes suitable for first-time buyers is to be supported by local planning authorities unless such need is already to be met at other locations within the authority

area. These sites should comprise of entry-level homes that offer one or more types of affordable housing.

3.19 The document also promotes a theme of enhancing healthy and safe communities which is to be achieved by creating places which *"promote social interaction (and) enable and support healthy lifestyles*."

3.20 As part of this approach social, recreational and cultural facilities and services that the community needs should be provided guided by planning policies which:

- *"plan positively provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services;*
- *support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*
- *help prevent unnecessary loss of valued facilities and services."*

3.21 Plan making through the guidance of the NPPF recognises the important role of access to open spaces and other facilities which provide opportunities for sport and physical activity in terms of health and well-being of communities. The importance of delivering a sufficient choice of school places to meet the needs of existing and new communities is also recognised in the document and local planning authorities should take a "*proactive, positive and collaborative approach to meeting this requirement*".

3.22 The NPPF also sets out that the standard method provided in national planning guidance should be used to undertake a local housing need assessment identifying the minimum number of homes needed. The **Housing Delivery Test Measurement Rule Book**[7] provides this standard method allowing for calculation of objectively assessed housing need using government household forecasts adjusted for local house prices and local earnings. Unmet need from neighbouring areas will also need to be taken into account as part of the calculation.

NPPF - Economy

3.23 The **NPPF** contains an economic objective to "help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity."

3.24 It also requires that planning seeks to "create the conditions in which businesses can invest, expand and adapt" with policies required to "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth". Policies addressing the economy should also seek "to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment."

3.25 Planning policies are also required specifically to address support for the rural economy. Sustainable growth and expansion of all types of business and enterprise in rural areas should be supported, both through conversion of existing buildings and well-designed new

[7] Ministry of Housing, Communities and Local Government (July 2018) *Housing Delivery Test Measurement Rule Book*

buildings, while the diversification of the rural economy and promotion of sustainable rural tourism and leisure developments is also supported

3.26 The NPPF also supports the role of town centres as functioning at the heart of local communities. This support is required to provide for a "*positive approach to [town centres'] growth, management and adaptation*." Included within this support is a requirement to *"allocate a range of suitable sites in town centres to meet the scale and type of development needed, looking at least ten years ahead."*

NPPF - Transport

3.27 The **NPPF** requires that "transport issues should be considered from the earliest stages of plan-making". The scale, location and density of development should reflect "opportunities from existing or proposed transport infrastructure". To help reduce congestion and emissions, and improve air quality and public health the planning system should focus significant development "on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes." The draft revised framework also requires that planning policies support an appropriate mix of uses across an area to further help reduce the need to travel as well as the provision of high quality walking and cycling network.

3.28 While the framework promotes the use and development of sustainable transport networks it also requires that "where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development" should be identified and protected.

NPPF - Air, Land and Water Quality

3.29 The **NPPF** states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued soil and the economic and other benefits of the best and most versatile agricultural land. Policies should also prevent new and existing development from "*contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution."*

3.30 The document also requires that strategic policies should seek to make the most effective use of land in meeting local requirements making as much use as possible of previously-developed or 'brownfield' land. Furthermore policies should "*support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land*".

NPPF - Climate Change Adaptation and Mitigation

3.31 The **NPPF** contains as part of its environmental objective a requirement to mitigate and adapt to climate change, *"including moving to a low carbon economy"*. The document also states that the "*planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change."* To achieve these aims new development should be planned to ensure appropriate adaptation measures are included (including green infrastructure) and should be designed, located and orientated as to help to reduce greenhouse gas emissions.

3.32 The revised framework also requires that development is directed away from areas which are at highest existing or future risk of flooding. Where development is required in such areas, the "*development should be made safe for its lifetime without increasing flood risk elsewhere."*

3.33 In relation to coastal change in England planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Furthermore plans should "*reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast".*

NPPF - Biodiversity

3.34 A further requirement of the **NPPF's** environmental objective is that the planning system should contribute to protecting and enhancing the natural environment including helping to improve biodiversity, and using natural resources prudently. In support of this aim the framework states that Plans should "*identify and map safeguard components of local wildlife-rich habitats and wider ecological networks"* and should also "*promote the conservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*"

3.35 The framework requires that plans should take a strategic approach in terms of "maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries".

NPPF - Historic Environment

3.36 Of relevance to the approach of the planning system to the historic environment the **NPPF** contains an environmental objective to contribute to the protection and enhancement of the built and historic environment. The document also sets out a strategy to seek "*the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay and other threats."* Such a strategy is required to take into consideration the desirability of sustaining and enhancing the significance of heritage assets and bringing them into viable use.

3.37 It should also be considerate of the wider benefits of conserving the historic environment, the contribution new development can make in terms of character and distinctiveness and the opportunity for the historic environment to contribute to this character and distinctiveness. Local authorities should also maintain or have access to a historic environment record which is to be supported by up to date evidence.

NPPF - Landscape

3.38 The Cranbrook Plan will be required to have consideration for the conservation and enhancement of landscape character in the District. The **NPPF** includes as part of its approach to protecting the natural environment, recognition for the intrinsic character and beauty of the countryside, and the wider benefits to be secured from natural capital. Importantly, great weight is to be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty.

3.39 As part of the approach to achieving well-designed places the NPPF states that planning policies and decisions should ensure that developments "*are sympathetic to local character and history, including the surrounding built environment and landscape setting*."

East Devon planning policy

3.40 The East Devon Local Plan allocates land for development at Cranbrook through Strategy 9: Major Development at East Devon's West End and Strategy 12: Development at Cranbrook. Additional development land that is allocated in the Cranbrook Plan is within the wider Cranbrook Plan area that is referred to in Strategy 12 of the East Devon Local Plan and spatially defined on the Local plan Policies Map. The Local Plan policies also set out criteria that will apply to all new development at the West End of the District, including at Cranbrook - Strategy 10: Green Infrastructure in East Devon's West End and Strategy 11: Integrated Transport and Infrastructure Provision at East Devon's West End. Proposals within the Cranbrook Plan should be in conformity with these and other strategic Local Plan policies, as well as the general development management policies in the Local Plan.

3.41 Since the SA of Issues and Options report was undertaken the following guidance documents, that could have relevance for the future development of Cranbrook, have been produced:

- Planning Obligations Supplementary Planning Document – see http://eastdevon.gov.uk/planning/planning-policy/planning-obligations-supplementary-planning-document-spd/
- East Devon Gypsy and Traveller Site Design and Layout Supplementary Planning Document – see: http://eastdevon.gov.uk/media/2016282/final-doc-gypsy-and-traveller-site-design-and-layout.pdf

3.42 A number of Neighbourhood Plans are being prepared by the communities around Cranbrook and East Devon District Council is working with these communities to ensure that they develop plans for their future that build on the opportunity presented by Cranbrook. Within the vicinity of Cranbrook a neighbourhood plan has now been made for the parish of Rockbeare. Neighbourhood plans are currently being prepared by Broadclyst, Whimple and Clyst Honiton Parish Councils and the relationship between the neighbourhood plans, the Local Plan and the Cranbrook Plan is one of the issues that may be relevant to the Cranbrook Plan.

3.43 The Greater Exeter Strategic Plan (GESP) will cover the four local planning authority areas of East Devon, Exeter City, Mid Devon and Teignbridge. GESP is at an early stage of production, an issues report was published in 2017, and the current schedules show a consultation draft of the plan, with a number of alternative development options in it, being consulted on in June 2019. The proposal is then for a follow on full draft plan being consulted on (starting in) late 2019. Publication consultation is planned for 2020.

Baseline information

3.44 Baseline information provides the context for assessing the sustainability effects of proposals in the Cranbrook Plan and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. The requirements for baseline

data vary widely, but it must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends. Schedule 2 of the SEA Regulations requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors.

3.45 Baseline information for the whole of East Devon District has been collated and regularly updated throughout the SA of the East Devon Local Plan and has been consulted on as part of that SA process. Key baseline information about the Cranbrook area specifically is summarised below. Some of the information has been drawn from that gathered for the production of the Cranbrook Plan itself, (e.g. information about the proximity of flood zones and designated biodiversity sites) as well as datasets held by East Devon District council.

3.46 Cranbrook is a rapidly developing new town in East Devon, close to the City of Exeter and neighbouring villages of Whimple and Rockbeare. Development started onsite in June 2011 and the first new homes were completed in May 2012. By late 2018 around 1,830 new homes had been built and occupied and future planning permissions exists, that if/when implemented, would take Cranbrook to around 3,500 new homes. Planning applications by the main consortium developing Cranbrook for the construction of 4,120 further additional new homes, sports and leisure facilities and green infrastructure were also submitted to East Devon County Council in March 2015. In the summer of 2017 the consortium submitted a new major application that covered a similar land area to that featuring in one of the earlier applications. These applications have, as at January 2019, not been determined. A number of smaller schemes and sites at Cranbrook are either built or have planning permission or have been put forward by prospective developers. Plus there are existing homes in the Cranbrook area that may be taken to be at Cranbrook.

3.47 The East Devon Local Plan proposes the expansion of Cranbrook up to 2031 to accommodate nearly 7,800 new homes. This scale of development would make Cranbrook the second biggest town in East Devon, after Exmouth.

3.48 Cranbrook (on the basis of its current extent) is located approximately 3 kilometres to the east of Exeter at the nearest point and is approximately 1 kilometre to the north of Exeter Airport. Cranbrook is located near to the A30 trunk road and M5 motorway, and has a new railway station which has been built as part of the early stages of the town's development. During the 'rush-hour' the train into Exeter city centre takes only nine minutes compared to what can be a 40 minute or more drive by car, however, the train currently only runs hourly. In addition, there is a dedicated cycle route into Exeter from Cranbrook. However, the private car remains a key mode of transport in the area.

3.49 Cranbrook is being developed as a new town to include employment land, services and facilities alongside the new housing, within the context of significant growth within the 'West End' of East Devon. This means that Cranbrook will be in close proximity to the employment developments of Skypark, Science Park, a major warehouse facility and Exeter Airport. As well as being linked to Exeter by rail there are good quality cycle routes and bus services to the surrounding countryside and to the new Clyst Valley Regional Park through a network of footpaths and cycle ways.

3.50 A new primary school, St Martin's Primary, opened in September 2012 and a new healthcare facility, Cranbrook Medical Practice, opened in spring 2015. A second primary school and the first secondary school at Cranbrook opened in September 2015 at the new Cranbrook Education Campus. A respondent to the first consultation on the Cranbrook Plan noted that Cranbrook is a very community-spirited town with lots of activities going on.

3.51 Cranbrook is served by a Combined Heat and Power System that is already producing heat and electricity. In the future, with a move to green fuel sources, there is the potential for this to make Cranbrook a low carbon development.

3.52 There are no designated biodiversity sites within very close proximity of Cranbrook, although the East Devon Pebblebed Heaths Special Area of Conservation (SAC) and East Devon Heaths Special Protection Area (SPA) are approximately 3.5 kilometres to the south east and the Exe Estuary SPA and Ramsar site is approximately 6.5 kilometres to the south west. These sites are highly sensitive and the qualifying species and habitats that they are designated for are vulnerable to human pressures, including through recreation and general disturbance. East Devon District Council, in partnership with Natural England and the neighbouring authorities of Exeter City Council and Teignbridge District Council, have determined that housing and tourist accommodation developments in their areas will have a detrimental in-combination impact on the Exe Estuary SPA and East Devon Pebblebed Heaths SAC as a result of recreational use. These impacts have been found to be significant from developments within 10 kilometres of these European sites and the Cranbrook Plan area falls within this distance of both. The three Councils have prepared the South East Devon European Site Mitigation Strategy[8], which sets out a joint approach to mitigating the potential significant effects on the SAC and SPA including delivery of suitable alternative natural greenspace (SANGs) sites to try to encourage dog walking and other recreation activities away from the sensitive European sites.

3.53 In addition, Hellings Park Fen just north of the railway line (and north of Cranbrook) at Wishford Farm on the Killerton estate, is a County Wildlife Site. Further away the park and woods north of Killerton House are designated as a Site of Special Scientific Interest (SSSI) for their geology. Another County Wildlife Site, Ashclyst Forest, although not designated as an SSSI, is also of national importance for its lichens and the number of veteran trees it includes. The forest also supports an important population of pearl-bordered fritillary butterfly, a greatly declined UK Biodiversity Action Plan Priority Species and is important for bats.

3.54 Cranbrook is located some distance from the two Areas of Outstanding Natural Beauty (AONBs) in East Devon, being approximately 4 kilometres from the East Devon AONB to the south/south east and 10 kilometres from the Blackdown Hills AONB to the east. Cranbrook lies in the 'lowland plains' landscape character type, as identified in the East Devon Landscape Character Assessment[9] (it should be noted that at January 2019 this Landscape Character Assessment had been updated and a revised version was out for consultation). This area comprises low lying land adjacent to river valleys. It is flat and in

[8] South-east Devon European Site Mitigation Strategy. Footprint Ecology. June 2014 - http://eastdevon.gov.uk/planning-libraries/evidence-document-library/chapter8.4-environment/env038-footprintecologysedevoneuropeansitemitigationreport.pdf

[9] East Devon and Blackdown Hills Areas of Outstanding Natural Beauty and East Devon District Landscape Character Assessment and Management Guidelines (2008) - http://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/landscape/

mixed cultivation, with a variety of field sizes and patterns. Wide hedges, often elm-dominated, and hedge banks, are distinctive, often with prominent hedgerow oaks. The landscape around Cranbrook is relatively flat but falls away steeply to the south along an escarpment bordering the airport and Rockbeare village. The land rises sharply in the north east towards the green wedge east of Whimple.

3.55 The East Devon Local Plan Strategy 10: East Devon's West End promotes the Clyst Valley Regional Park (CVRP) as a green infrastructure initiative that will provide high quality natural green space. The CVRP land allocation surrounds Cranbrook and parts within it could potentially function as a SANG to mitigate the recreational impact of additional visitors to the European designated East Devon Pebblebed Heaths and the Exe Estuary.

3.56 Most of Cranbrook lies outside of high flood risk zones, although there are areas of flood zones 2 and 3 which extend within the area that is allocated in the East Devon Local Plan, across the northern boundary and through the centre of the area. Detailed technical assessment work has been undertaken in respect of flooding considerations in support of production of the Cranbrook masterplan and Cranbrook Plan. Much of the Cranbrook development area and surrounding land is Grade 3 agricultural land, although it is not known if this is Grade 3a or 3b. Northern parts of Cranbrook are within Grade 4 agricultural land.

3.57 Rockbeare Manor Registered Park and Garden is located approximately 500 metres to the south east of Cranbrook and there are a number of listed buildings within and around the development area. Approximately 5 kilometres to the north-west is the National Trust estate at Killerton (a Grade II* listed Park and Garden), and nearby in Broadclyst village there is a designated Conservation Area. Cranbrook falls within the defined 'Zone of Potential Influence' identified in the Killerton Setting Study[10] which locates Cranbrook principally within a sub-area of the Lowland Plains landscape character type, character area 6c, which forms the middle to distant setting to the southern part of Killerton Park, featuring in key views from Killerton Garden. The study recognises this area to only be of low significance to the Park and currently subject to the greatest degree of change of all the areas covered by the study. However, whilst the area is of low significance to Killerton Park the potential for impacts on this heritage asset have been considered during the preparation of the Cranbrook Plan and through the SA.

3.58 There are no Air Quality Management Areas within or near to Cranbrook – the only one that has been declared in East Devon District is within Honiton, further to the east. The proximity of Exeter Airport to the south of Cranbrook means that noise is a significant concern, as well as other possible impacts associated with airport operation.

Key sustainability issues

3.59 A set of key sustainability issues for Cranbrook was identified during the Scoping stage of the SA and was presented in the September 2015 Scoping letter and these are presented in Table 3.1 below. In light of comments received during that consultation, a small number of amendments were made to the sustainability issues at the Issues and Options stage of

[10] LUC, (2013), *Killerton Setting Study - http://eastdevon.gov.uk/media/1091829/nt-killerton-setting-study-report-v2_final.pdf*

SA work. In this appraisal the SA options used in the Issues and Option appraisal and the preferred approach stages of plan making are replicated.

Likely evolution without the Cranbrook Plan

3.60 In recognition of the SEA Regulation requirement (Schedule 2) that the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme must be described in the Environmental Report, **Table 3.1** overleaf describes the likely evolution of each key sustainability issue if the Cranbrook Plan were not to be produced and adopted.

Table 3.1: Key Sustainability issues for the plan and likely evolution without it

Key Sustainability Issue	Likely evolution of the issue without implementation of the Cranbrook Plan
The need to ensure that large-scale new development is appropriately integrated into the landscape, respecting and enhancing local character where possible.	In the absence of the Cranbrook Plan, this issue would still be addressed to some extent through relevant policies in the adopted East Devon Local Plan. The Local Plan Strategy 5: Environment states that new development will incorporate open space and high quality landscaping to provide attractive and desirable natural and built environments for new occupants and wildlife. Strategy 46: Landscape Conservation and Enhancement and AONBs requires development to be undertaken in a manner that is sympathetic to, and helps conserve and enhance the quality and local distinctiveness of, the natural and historic landscape character of East Devon. These general East Devon-wide policies will apply to all new development, including large-scale development at Cranbrook. However, if the Cranbrook Plan were not to be adopted, the opportunities to include policies relating to the landscape impacts of the town specifically would be lost; therefore this issue would not be as well addressed. Similarly, the lack of a comprehensive plan for Cranbrook would mean that the development is less likely to be comprehensively planned and well-integrated into the landscape.
The need to ensure that large scale new development is compatible with the wider transport network.	In the absence of the Cranbrook Plan, this issue would still be addressed to some extent through relevant policies in the adopted East Devon Local Plan. Strategy 12: Development at Cranbrook sets the overall context for the development in the Local Plan and states that the Council will produce an Infrastructure Delivery Plan that will set out key requirements recognising the need for improved transport links and road improvements as Cranbrook grows. However, if the Cranbrook Plan were not to be adopted, opportunities to consider this issue in more fined grained detail would be lost, as would opportunities to include locally specific policies relating to this issue.
The need to protect biodiversity (in particular the Exe Estuary SPA and East Devon Pebblebed Heaths SAC) from the impacts of large-scale development in the area, in particular increased recreation pressure.	In the absence of the Cranbrook Plan, this issue would still be addressed to some extent through relevant policies in the adopted East Devon Local Plan. Strategy 10: Green Infrastructure in East Devon's West End refers to the potential impacts on biodiversity, including from recreation, of the large-scale growth proposed in the West End, including at Cranbrook. The policy refers to the South East Devon European Site Mitigation Strategy which has been developed to ensure that impacts on European sites specifically are avoided, and which would still be in place in the absence of the Cranbrook Plan. However, without the Cranbrook Plan the opportunities to consider in more detail at the Cranbrook level the likely impacts of development at the town on biodiversity, and to address them, would be lost.

Key Sustainability Issue	Likely evolution of the issue without implementation of the Cranbrook Plan
High flood risk in some parts of the development area, and the need to consider impacts on strategic watercourses.	In the absence of the Cranbrook Plan, this issue would still be addressed to some extent through relevant policies in the adopted East Devon Local Plan. Policy EN21: River and Coastal Flooding specifies that a sequential approach will be taken to determining the location of new development, focussing it in Flood Zone 1 where possible before Flood Zones 2 and 3. East Devon-wide policies such as this will also apply within Cranbrook. However, without the preparation of the Cranbrook Plan, opportunities to consider the issue of flooding, in some detail, would be lost.
The need to conserve and enhance the setting of listed buildings and other heritage features, such as Killerton Registered Park and Garden.	In the absence of the Cranbrook Plan, this issue would still be addressed to some extent through relevant policies in the adopted East Devon Local Plan. Policy EN8: Significance of Heritage Assets and their Setting sets out the requirements for developers to proportionately and systematically assess the significance of any heritage assets and their settings which could be affected by development. Policy EN9: Development Affecting a Designated Heritage Asset states that the Council will not grant permission for developments involving substantial harm or total loss of significance of a designated heritage asset unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh that harm or loss, or that various criteria apply. These and other relevant East Devon-wide policies will apply to all development, including that at Cranbrook. However, without the preparation of the Cranbrook Plan, opportunities to consider impacts on the historic environment during the detailed masterplanning process and subsequent policy formulation would be lost.
The need to avoid high levels of car use by balancing residential development with an appropriate range of employment opportunities, services and facilities.	In the absence of the Cranbrook Plan, this issue would still be addressed to some extent through relevant policies in the adopted East Devon Local Plan. Strategy 12: Development at Cranbrook sets the overall context for the development in the Local Plan and states that jobs, social and community facilities will be provided alongside housing at the town. However, this policy is high level and does not include any detail about the specific location of different types of development within the town. The distribution of uses has be considered in great detail through the Cranbrook Plan making process and as translated into plan wording and the policies map. Therefore, in the absence of the Plan, the issue would not be as comprehensively addressed.

4 SA and wider work and findings at the Issues and Options stage

4.1 An SA report was produced for the Council by LUC at the Issues and Options stage of plan making[11] and was consulted on; summary commentary of this and other work on Cranbrook Plan making is provided below.

Masterplanning work undertaken prior to the Issues and Options report

4.2 Prior to preparation of the Issues and Option report a series of Concept Masterplans were developed during two workshops held in July and September 2015, both of which were two days long and were led by the Savills Masterplanning team and chaired by the Design Council. During the workshops delegates heard about some of the potential issues that development at Cranbrook is trying to resolve and the possible opportunities that Cranbrook has to be a successful and sustainable new town. The workshops explored possible ways in which the design and layout of Cranbrook could capitalise on opportunities and resolve problems. Delegates explored how this information could inform the way Cranbrook expands in the future by placing squares representing hectares of different types of land use onto a scale map of the potential development area.

4.3 The Savills team took these designs and when reviewing them found they largely conformed to two different design ideas. The Savills team produced two composite plans that formed concept masterplans. These were tested by the consultants to see which was viable, given the development context and the requirements of a sustainable settlement.

4.4 The masterplans were provided to LUC to be subject to SA in early 2016, and the SA findings were sent to East Devon District Council in February 2016. This work was not made publicly available at that time but was presented in the Issues and Options SA report.

Issues and Options report and it's Sustainability Appraisal

4.5 The Issues and Options document for the Cranbrook Plan was informed by the early masterplanning work. This Issues and Options report set out an overall Vision and Strategic Objectives for the Plan and outlined the factors that could affect the development of a sustainable new town at Cranbrook.

4.6 An SA of the Issues and Options document was undertaken and was consulted on alongside the issues report. Succinct summary commentary of how the SA was undertaken is set out below but the SA report should be referred to for a complete picture. It should also be noted that this earlier appraisal has informed subsequent appraisal work.

4.7 Although the issues report did not present specific policy options for addressing those issues, Part 4 of it did allude to some high level alternative approaches that could be taken to address some of the issues. The SA of the Issues and Options report highlighted various sustainability considerations associated with the alternatives.

[11] http://eastdevon.gov.uk/media/1762544/6596-cranbrook-sa-report.pdf

4.8 The Issues and Options document provided an introductory overview of Cranbrook, in its Chapter 1, and presented background material and evidence in its chapter 2. Chapters 3 and 4 of the Issues and Options report presented a vision and objectives. The SA of the Issues and Options document appraised the vision and objectives and broadly speaking noted positive or negligible sustainability impacts when compared against the SA objectives, there were however a number of cases where uncertainty of impact was noted.

4.9 Chapter 5 of the Issues and Option document identified a series of key issues of relevance to the future of Cranbrook and its development. These specifically were:

a. Health and wellbeing
b. Culture, sport and community
c. Economy and enterprise
d. Energy and climate change
e. Transport
f. Landscape and biodiversity
g. Design and housing
h. Delivery and flexibility

4.10 Material relating to these issues was provided along with commentary on certain ways that issues be approached or addressed. The SA report, at the issues and options stage of plan making, provided a high level commentary of the potential sustainability effects of those broad approaches and identified particular areas where there could be positive or negative effects and issues that might need to be considered if and when more detailed policies were worked up.

4.11 Chapter 6, Next Steps, concluded the Issues and Options report by setting out four development scenarios, these were:

- Scenario 1. Current density and development within areas subject to noise levels above recommended limits;
- Scenario 2. Current density and development in Neighbourhood Plan areas;
- Scenario 3. Increased average density to 45 dwellings per hectare and development within areas subject to noise levels above recommended limits; and
- Scenario 4. Increased average density to 45 dwellings per hectare and some land within Neighbourhood Plan areas.

4.12 The four scenarios were used to generate diagrammatic options of potential future development. These scenarios illustrated that maintaining current average housing density levels (35 dwellings per hectare – as previously recorded and noted by the Council) could make it likely that development would have to take place in areas that will either affect the visual amenity of existing settlements or in areas where future residents would be affected by noise levels above World Health Organisation recommendations. It should be noted that further work on density levels at Cranbrook was undertaken (dated Summer 2017), see **Appendix 3,** which indicates that existing net residential development levels currently being built at Cranbrook are around 42 dwellings per hectare. It is stressed, however, that this is a net development level and is essentially concerned with the density of development of new homes and their immediate surrounding environments. A gross density assessment has not been undertaken as part of the SA work but it would show a lower level of houses per hectare on account of large areas of land that form parkland,

space for highways and non-residential uses and other uses. The SA of the Issues and Options report noted that increasing average housing density to the level suggested by Savills (45 dwellings per hectare) reduces land-take, the likelihood of visual impact and the need to build in areas subject to high noise levels. If it is assumed the 45 dwellings per hectare reference is or should be taken as a net density figure (worked out along the lines highlighted in **Appendix 3**) and the actual density increases proposed in the then emerging Masterplan work were not therefore that great. Notwithstanding recent density assessment work any increase in density also increases the probable viability of businesses by putting more people within easy walking distance of such businesses and neighbourhood centres and higher density development tends to encourage greater pedestrian activity in general and therefore footfall.

4.13 The SA work at Issues and Options stage appraised the four scenarios and associated layouts for development. The assessment included a tabulated comparative assessment of the options at its Table 4.2, this is reproduced below;

SA objective	Scenario 1	Scenario 2	Scenario 3	Scenario 4
1. Housing	-	+	-/+	+
2. Community services	-	-	+	+
3. Education and skills	0	0	0	0
4. Health	-	+/-	-/+	+
5. Crime	0	0	0	0
6. Noise	--	+	--	+
7. Leisure and recreation	-	-	+	-
8. Historic environment	-/+?	-/+?	+/-?	+/-?
9. Landscape character	+/--?	+/--?	+/--?	+/--?
10. Amenity	-	+	-	+
11. Biodiversity	-?	-?	+?	+/-?
12. Sustainable transport	-	-	++/-	++/-
13. Air, soil and water	-	-	+/-	+/-
14. Greenhouse gas emissions	-	-	++/-	++/-
15. Flood risk	0	0	0	0
16. Energy efficiency	0	0	0	0
17. Waste	0	0	0	0
18. Employment	0	0	0	0
19. Vitality and viability of towns	-	-	+	+
20. Inward investment	-/+	-/+	+	+

4.14 The SA of the issues report includes a summary commentary of the assessment undertaken, at paragraph 4.41 it advises:

> *"In general, the effects of Scenario 4 on the SA objectives are broadly more positive than those of the other three scenarios. Many of the sustainability effects of the scenarios are influenced by the likely density of development, with the higher density development proposed under Scenarios 3 and 4 having generally more positive effects than the more dispersed and lower density development that would result from Scenarios 1 and 2. However, the effects of Scenario 3 are less positive than Scenario 4 because it would steer development to areas of high noise levels which could adversely affect a number of the sustainability objectives."*

4.15 The Savills Masterplanning work in 2017 formed a refinement to the Scenario 4 proposals.

4.16 Scenario 4 is described in the Cranbrook Issues and Options report as follows:

> *"6.32 This scenario would avoid development on land that is subject to noise in excess of recommended limits.*
>
> *6.33 It also avoids development on or near to ridgelines thereby avoiding potentially visually intrusive development, particularly when viewed from Rockbeare.*
>
> *6.34 It would however lead to some development within Neighbourhood Plan areas potentially impacting on the separation between Rockbeare and Cranbrook. By placing development on both sides of the London Road this option means that this road would become a functioning part of Cranbrook, forming a gateway and potentially supporting the development of commercial activity and helping to support businesses in Cranbrook.*
>
> *6.35 Higher densities would reduce the amount of land needed overall. Some may however feel that higher density is not appropriate and favour maintaining existing density levels, to do so would require more land than is shown in this scenario."*

Consultation feedback on the SA of the Issues and Options report

4.17 At the time that the Cranbrook Plan Issues and Options report was consulted on the SA report of the Issues and Options plan was also consulted on. In total seven respondents made specific comment on the SA (or referred to it in their overall response). A summary of issues raised and a Council officer response is set out below. It should be noted that many respondents commenting on the Issues and Options report made reference to sustainable development issues, however, as their comments were not directly about the actual SA they are not summarised here.

4.18 The most substantive comments made on the SA were received from David Lock Associates who are acting for the East Devon New Community Partners (EDNCp) – the main consortium that are currently developing Cranbrook. The EDNCp have undertaken the bulk of development at Cranbrook and in the context of the SA work it is relevant to note that EDNCp have three planning applications for Cranbrook expansion that were validated in March 2015 but which have not yet (as at January 2019) been determined, plus one more with (amongst other matters) a variation on a site in one of the original submission, this was submitted in summer 2017. The applications (which if implemented would provide around 4,500 new homes) propose the expansion of Cranbrook in easterly, westerly and south-westerly directions. It should also be noted that attached as supporting commentary to the EDNCp response on the SA of the issues report was a technical document relating to noise issues produced by the consultancy firm Cole Jarmen. This technical assessment is not included or summarised in the seven responses because it is in support of the overarching EDNCp submission.

4.19 Many of the comments made by EDNCp on the SA of the Issues and Option report have a specific and direct bearing on the appropriateness and acceptability of the potential expansion of Cranbrook in a South-westerly direction. The EDNCp expansion proposal, as set out in one of their planning application, would see development, specifically including new homes, being built close to Exeter airport. East Devon District Council, as explicitly

set out in the Issues and Options report, consider it appropriate to apply World Health Organisation standards and noise thresholds in determining areas suitable for residential development. Applying such standards would render the southern parts of the south western area proposed by EDNCp as unsuitable for new housing. At the Issues and Options stage of plan making the EDNCp challenged the appropriateness of use World Health Organisation standards and instead advocate that other standards should be used that if applied, they contest, would **not** make the identified areas unsuitable for housing. This SA work refers to noise concerns though it does not go into specific and detailed technical assessment on the subject matter. East Devon District Council have taken specialist noise advice from the consultancy firm of Bickerdike Allen[12].

4.20 This SA does not seek to rerun or address technical arguments over noise that are raised by Cole Jarman for EDNCp or Bickerdike Allen for East Devon District Council. The Council assessment in this SA is premised on the work of Bickerdike Allen being sound and robust and that is should be taken forward and be used to determine appropriate areas for development, particularly on the basis of applying a precautionary approach to noise issues. This Council approach reflects health concerns, identified by the Council, in respect of residential living spaces and specifically outdoor spaces such as gardens and balconies that could be exposed to airport noise, indoor spaces could also be affected if noise insulated windows are opened. The Council approach also reflects the importance attached to the operation of Exeter airport and the desire to see a long term future for the airport. There is a very real concern that if houses are built too close to the airport then residents of those houses could object to airport noise. Such objections could result in measures to reduce flights or other operations at the airport and this could threaten its current operation and future airport operations or expansion.

4.21 It should be noted that there are other areas of land at or near to Cranbrook that can be developed that would not be in disputed noise sensitive locations and this has helped inform Cranbrook Plan development. Notwithstanding these observations this SA work does consider and appraise site options and alternatives for development, including residential uses, in areas that are exposed to differing noise levels.

[12] See documents at: http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-preferred-approach-evidence-base/#article-content

Table 4.1: Summary of consultation feedback on the SA of the Issues and Options report

Comment by	Subject matter and summary of Comments made on the SA of the Issues and Options report	East Devon District Council - Officer Response
David Lock Associates for East Devon New Community Partners (EDNCp)	<u>South Western Expansion of Cranbrook</u> At paragraph 5.15 of their submission EDNCp raise concerns that the SA has not fully and appropriately considered the wider sustainability benefits of their proposed south western expansion of Cranbrook. EDNCp specifically advise in their paragraph 5.15: *"EDNCp's concerns are that the positive opportunities for supporting and underpinning the sustainable credentials of Cranbrook as it expands are not properly acknowledged in the Issues and Options report to date and in particular in the Sustainability Appraisal that accompanies it. In this regard one issue to be addressed through the Sustainability Appraisal is a more considered assessment of positive sustainability benefits of development within the "South Western Expansion Area".*	In response to concerns raised about the need for what is presented as a more considered assessment of south-westerly expansion (as promoted by EDNCp) this appraisals work specifically assesses the overall south western expansion site that is being promoted for development by EDNCp. Site assessment is undertaken in the context of additional further appraisal work specifically in respect of noise issues and also the location of neighbourhood facilities and their accessibility on foot and the role of London Road and development related to it.
David Lock Associates for East Devon New Community Partners (EDNCp)	<u>SA Production Process</u> At paragraphs 7.01 to 7.02 of their submission EDNCp raise concerns about the process and timing of SA production to support the Issues and Options report. They consider the SA is flawed and they contest it was prepared in a hurry. Concerns raised in paragraph 7.02 of the EDNCp response included: • failure to promote sustainability objectives; • lack of consideration of cumulative synergistic effects; • lack of specific consideration given to Cranbrook as opposed to the previous East Devon context (and reuse of the old approach); • lack of consideration of mitigation and the effects of mitigation; and • the simplistic evaluation of objectives on the basis of little or limited background assessments.	Whilst it is not accepted that the SA at Issues and Options stage was limited and flawed (it was in fact relevant and appropriate to the document that was produced) the new appraisal at masterplan stage of plan production (and also at Publication stage of Plan making) includes much more detail. It is still considered appropriate to see Cranbrook within a wider East Devon context and for consistency and soundness reasons to use existing SA objectives for appraisal purposes. These objectives are introduced in Chapter 2 of the SA and referred to in subsequent chapters.
David Lock Associates for East	<u>Identifying Reasonable Alternatives</u> At paragraphs 7.04 to 7.07 of their submission EDNCp set out a case that the SA process was not iterative and that reasonable alternatives	In this appraisal reasonable options and alternatives are appraised.

Comment by	Subject matter and summary of Comments made on the SA of the Issues and Options report	East Devon District Council - Officer Response
Devon New Community Partners (EDNCp)	have and were not considered. They advise that reasonable and realistic alternatives have not been considered and they specifically refer to noise considerations associated with the airport.	
David Lock Associates for East Devon New Community Partners (EDNCp)	<u>Airport Noise</u> At paragraph 2.31 of their submission EDNCp raise concerns that the SA has not addressed the holistic benefits of the southerly expansion of Cranbrook. This comment is made in the context of noise considerations, application by the Council of World Health Organisation standards (in general and in a blanket fashion) and the Council ruling out certain areas of land, close to the airport, as suitable for development that EDNCp consider are suitable. EDNCp specifically advise, in the first bullet point of paragraph 2.31: *"EDNCp's concerns are that:* *the positive opportunities for supporting and underpinning the sustainable credentials of Cranbrook as it expands are not properly acknowledged in the Issues and Options report to date and in particular in the Sustainability Appraisal that accompanies it (In this regard one issue to be addressed through the Sustainability Appraisal is a more considered assessment of positive sustainability benefits of development within the "Southern Expansion Area)."* At paragraphs 7.08 of their submission EDNCp set out that alternative standards or thresholds to those of the World Health Organisation should have been applied in the SA work. The EDNCp continue at paragraph 7.11 of their comments by noting that the SA work does not consider alternative standards, they specifically note those of the Noise Policy Statement for England which is applied to planning practice and plan making by the Planning Practice Guidance Note. At paragraph 7.18 they specifically advise that "In short the guidance notes that it is only at the point where noise exposure exceeds the significant observed effect level that noise starts to result in a material change in behaviour."	This appraisal considers noise issues in detail. In undertaking SA work this appraisal does not seek, however, to critically review technical noise evidence. The appraisal is produced in the context of technical matters relating to airport noise being addressed elsewhere in specific noise related assessment work. In simplified terms the Council critique is that developing in noisy areas is, in principle, best avoided and in broad terms the closer to the airport development is located the greater the noise levels and pollution that users and occupants of buildings experience will typically be. This SA report and the assessment within it is produced on an assumption, justified by specific council noise evidence (see the Bickerdike Allen report), that there are and would be adverse health and quality of life impacts that would arise should development occur within or on areas of land that fall within the 55 dB standard promoted by the World Health Organisation. This appraisal work recognises that noise issues are relevant to some sustainability concerns and that there are other sustainability considerations where noise is not of relevance. In appraising the option of development in the south west area, as promoted by EDNCp, this assessment work highlights a number of sustainability benefits that the EDNCp sites could help promote; it does this, however, in the context of noting potential for significant adverse impacts associated with noise concerns.

Comment by	Subject matter and summary of Comments made on the SA of the Issues and Options report	East Devon District Council - Officer Response
	The EDNCp submission advises that the airport noise is/would be at a 'lowest observed adverse effect level' and that this is a standard that should be considered in appraisal noting that consideration should be given (in SA work) to mitigation and minimising effects. At paragraph 7.20 EDNCp highlight that applying what they consider to be a more appropriate lower standard would not impinge on potential expansion areas at Cranbrook. At Paragraph 7.21 EDNCp highlight that: World Health Organisation standards do not feature in in Planning Practice Guidance; The Council are seeking to apply standards that are more onerous than those applied by the Airport in their Masterplan; The Council are seeking to apply a tool that is not supported as a tool for strategic assessment by the National Physics Laboratory Report; That the Council standards is meant to relate cases where there is continuous and steady noise; Nosiest levels relatively infrequently occur; Higher noise protection is not applicable in a new town of 8,000 dwellings. The EDNCp summarise at paragraph 7.23 that in their opinion the SA should consider differing baseline assumptions in respect of noise.	
David Lock Associates for East Devon New Community Partners (EDNCp)	<u>Density</u> At paragraphs 7.09 to 7.10 of their submission EDNCp set out that alternatives scenarios of increasing density, above that which has been achieved to date, should not be seen as a realistic alternative. They highlight, in respect of Scenarios 3 and 4 in the Issues and Options document, that: The suggested higher density levels are already being achieved; Existing densities are causing parking and amenity concerns;	In response to representations made the issue of density levels have been revisited. Appendix 3 to this SA report provides an assessment of net density levels built at Cranbrook at Summer 2017. This new assessment indicates that the current phases of houses at Cranbrook have been built at an average density of around 42 dwellings to the hectare – the net density is taken to comprise of houses and gardens, estate roads and footpaths and incidental open space in estates. It excludes such areas as strategic highways and access roads, major landscaping areas

Comment by	Subject matter and summary of Comments made on the SA of the Issues and Options report	East Devon District Council - Officer Response
	The council do not set out how density is being measured; Applying higher density would undermine the successful approach adopted to date; Future higher densities would push high density development to the edges of Cranbrook rather than the core. At paragraph 7.26 the EDNCp challenge what they see as an assumption in the SA that increasing density will mean lower levels of development into landscape sensitive areas nor, it is contested, does the SA highlight negatives associated with increasing densities. At paragraph 7.28 the EDNCp advise, in response to their reading of assumptions in the SA, that: Increasing density would not result in a greater range of homes; It would not lead to more walkable neighbourhoods – contesting that it would lead to a need for more open space; Would result in lower population levels in Cranbrook expansion areas and would negatively impact on viability.	and parks, playing fields, schools and community and businesses uses. In respect of proposed density of future development the Master planning work that subsequently has informed policy formulation sets proposed development zones and areas. These zones specify density of development that is planned for.
David Lock Associates for East Devon New Community Partners (EDNCp)	<u>Landscape</u> At paragraph 7.26 the EDNCp welcomes the recognition in the SA that the landscape effects of the alternative scenarios can only be considered to be inconclusive as little or no detailed information is available.	The Masterplan work, that subsequently informed policy, is supported by detailed landscape assessment work. The SA work applies principles relevant to consideration of landscape issue in assessing broad approach and land options for future Cranbrook development.
David Lock Associates for East Devon New Community	<u>Mitigation</u> The EDNCP consider, paragraph 7.45, that little reference is made to potential mitigation of landscape or noise impacts in the SA report. They highlight that their noise consultants, Cole Jarman, set out a considerable range of measures for noise mitigation, they highlight at Paragraph 7.49	It is recognised that there is some scope for mitigation of adverse noise impacts. But there are limitations to how far mitigation can go and this would be especially relevant to the noisiest areas, typically those closest to the airport and for where there is outdoor space, such as the garden areas of new homes.

Comment by	Subject matter and summary of Comments made on the SA of the Issues and Options report	East Devon District Council - Officer Response
Partners (EDNCp)	of their submission measures to include - through layout, building design, conditions, non-sensitive uses and engine testing pen.	
David Lock Associates for East Devon New Community Partners (EDNCp)	Neighbourhood Plan Areas At paragraph 7.56 of their submission the EDNCp express concern that the SA work has not taken into account Neighbourhood Plan areas.	It is recognised that Neighbourhood plan areas are of some relevance in informing policy choices but potential constraints they may apply should be seen alongside other planning and evidence considerations. Where technical evidence supports and justifies Neighbourhood Plan policies this has been of relevance in informing future Cranbrook Plan policy.
David Lock Associates for East Devon New Community Partners (EDNCp)	Green Wedges At paragraph 7.56 of their submission the EDNCp express concern that the SA work has not taken into account avoidance of development in Green Wedge areas.	It is recognised that Green Wedges are of relevance in informing policy choices but potential constraints they may apply should be seen alongside other planning and evidence considerations. Furthermore, it should be noted that Green Wedges do not place an absolute ban on development, there fundamental purpose is to resist settlement coalescence that potentially could arise from development.
David Lock Associates for East Devon New Community Partners (EDNCp)	Viability At paragraph 7.57 of their submission the EDNCp express concern that the SA work has not taken into account viability issues and specifically securing critical mass of development to deliver infrastructure, services and facilities.	It is not seen as specifically relevant for the SA work to directly address viability matters, though it is noted in the work that some options for development could be more costly than others and therefore viability matters may have a relevance in policy making choices. The Council has commission the consultancy firm of Three Dragons to assess viability considerations and their work has informed the Publication draft plan. Notwithstanding this separate consultancy work the Cranbrook Plan proposals do create areas of massing of development and this SA comments on massing related issues.
Natural England	Scope of the Issues and Options report and therefore of the SA In respect of the issues document just presenting four scenarios Natural England advise: *"It is however disappointing that this opportunity was not taken to examine policy, delivery or monitoring options, other than the four site specific scenarios. Our response is therefore limited and we assume that*	The observations of Natural England at Issues and Options consultation are noted. At the more detailed stage of Cranbrook plan work and consultation more detailed assessment has been undertaken.

Comment by	Subject matter and summary of Comments made on the SA of the Issues and Options report	East Devon District Council - Officer Response
	further options will follow this Issues and Options report and that they will undergo SA/SEA."	
University of Exeter – Centre for Energy and the Environment	Baseline Information and low carbon development The Centre for Energy and the Environment question the SA reference to the Cranbrook Heat and Power System making Cranbrook a low carbon development which is considered to over–simplify matters and to date cumulative CO_2 emissions are greater than if each house had a condensing boiler. It is considered that *"Much more needs to be done to ensure that Cranbrook lives up to its true on-site zero carbon intent through the generation of sufficient on- site renewable heat and electricity.*"	The points made are noted and agreed with. Cranbrook is not currently working as a low carbon development (noting the comparison with carbon levels if condensing boilers were fitted to houses). Text in the baseline information chapter of this SA is amended to recognise this point. The aspirations is, however, for dwelling/per person carbon emission levels to be lower in the future and it will be relevant for policies in the plan and wider initiatives to explore and seek to promote this outcome.
Jilling Hayes Planning for Mr A Pemberton of Higher Cobden Farm	Suitability for Development of Land at Higher Cobden Farm Jilling Hayes Planning are promoting their clients land for development through the Cranbrook plan and consider that the SA should assess the suitability of the land.	Post issues consultation SA work has considered the suitability of this land are for allocation.
Jilling Hayes Planning for Mr M Horn of Little Cobden	Suitability for Development of Land at Little Cobden Jilling Hayes Planning are promoting their clients land for development through the Cranbrook plan and consider that the SA should assess the suitability of the land.	Post issues consultation SA work has considered the suitability of this land are for allocation.
Trevor Preist	Lack of Numerical Data in the SA The respondent questions the lack of numerical data in the SA report in respect of transport and the implications of further development on vehicles levels and flows. The respondent advises of the need to employ transport specialist to assess transport matters and the submission	The point made about employing transport experts is noted and to inform plan preparation, and specifically the Masterplan work, the consultancy UDS have undertaken transportation assessment. The SA work has not sought to generate and assess technical transport work in its own right, rather it is based and reliant on the robustness of work undertaken to indicate the soundness of the overall Masterplan.

Comment by	Subject matter and summary of Comments made on the SA of the Issues and Options report	East Devon District Council - Officer Response
	highlights potential for significant movement of people for work purposes with concerns around potential scale and use of the private car.	
PCL Planning for Waddeton Park Ltd	Scenarios in the Issues and Options Report PCL Planning, for Waddeton Park, consider that Scenario 4 from the SA testing scores best and Scenario 2 is preferable to 1 and 3 (they consider that the latter two should not be taken forward).	The observations are noted. In detailed SA testing far more detailed assessment work is undertaken that supersedes the scenarios tested at Issues and Options stage.
PCL Planning for Waddeton Park Ltd	Housing Matters PCL Planning for Waddeton Park Ltd, consider that Scenario 3 should score as low as Scenario 1 as the noise issue related to this scenario is the determining factor. They also do not agree that a higher average density will lead to a greater range of housing types, sizes and appearance and is therefore a positive; this they contest can be delivered regardless of whether a higher average density figure is set or not.	Whilst the observations are noted it is considered that for non-noise matters the SA testing at Issues and Options consultation was correct in highlighting greater concerns with Scenario 1 compared to Scenario 3. The observations on higher densities are not agreed with as higher density development is considered to lead to a greater range of house types and will ensure facilities are easier to walk to.
PCL Planning for Waddeton Park Ltd	Community Services Objectives PCL Planning for Waddeton Park Ltd, do not agree that Scenarios 1 and 2 should be given a negative score. They consider walking distances is not the determining factor as has been assigned.	Whilst the observations are noted it is considered that higher density development will result in more people living within easy/easier walking distance of facilities in comparison to lower density development.
PCL Planning for Waddeton Park Ltd	Health and Wellbeing PCL Planning for Waddeton Park Ltd, do not agree that Scenario 3 should be given a positive. Noise issues, they contest, mean it should be given a negative and they do not agree that higher density development will automatically lead greater health and wellbeing benefits.	Specifically in respect of noise issues and for the potential for development near to the airport the health issue point is agreed with. SA testing, after the issues report, has been more detailed and considers noise and land development issues and possible development sites in far more detail.
PCL Planning for Waddeton Park Ltd	Greenhouse Gas Emissions PCL Planning for Waddeton Park Ltd, do not agree that Scenarios 1 and 2 should be marked negatively compared to 3 and 4. Being lower density, in respect of station location, does not mean that they cannot deliver positive benefits as a shuttle bus could be provided access to the station and people can use neighbourhood centres.	The preference should be to allow for people to walk to the station rather than be reliant on a shuttle bus noting that there is no guarantee that it would be provided or how good the service would be. Furthermore if a shuttlebus were provided it might lessen the scope for spending money that would be needed for other sustainability/service benefits.
PCL Planning for	Vitality and Viability	On this point it is not agreed that low density development will have the same or equal impacts as higher density development.

Comment by	Subject matter and summary of Comments made on the SA of the Issues and Options report	East Devon District Council - Officer Response
Waddeton Park Ltd	PCL Planning for Waddeton Park Ltd, feel that average higher densities being a benefit for the town centre is overplayed. The viability of the town centre will be a product of the large population being served and not because of density.	Higher density development in and near to the town centre, in particular, will provide a greater mass of people in and close to the town to support, use and interact with town centre facilities.

5 Overview of the SA at 2017 Preferred Approach stage of plan making

5.1 Using feedback from the issues and option consultation and through further research and assessment the proposals for future development at Cranbrook were refined and worked up to a Preferred Approach stage of plan making.

5.2 The Cranbrook Plan Preferred Approach was consulted on in late 2017 through to early 2018. The consultation actually sought views on two documents:

- The first was the Cranbrook Masterplan (the 2017 draft); and
- The second was a document setting out suggested policy subject areas for inclusion in the Cranbrook Plan at Publication stage (i.e. the stage of plan making that has now been reached, as at January 2019). It is stressed that they were not actual draft policies but rather they were headlines issues that subsequent policy wording may seek to address. For ease of reference they are, however called 'policies' in this appraisal.

Sustainability appraisal of the Cranbrook masterplan and it overarching themes

5.3 The sustainability appraisal of the Cranbrook masterplan (the masterplan as at 2017 and referenced in the first bullet point above) had stages of work that systematically responded to the key written themes set out in the masterplan itself. It should be noted that whilst a key part of the Masterplan document was a coloured-in map showing proposed locations for different types of uses, such as where housing might go, it was the over-arching text based in-principle considerations that the Masterplan appraisal majored on. The 2017 draft of the masterplan can be viewed at: http://eastdevon.gov.uk/media/2271420/d-170928-masterplan-document-title-update.pdf

5.4 The SA of the 2017 draft of the masterplan was split in to three parts as bullet pointed below (noting that these three parts reflect the actual form and structure of the masterplan itself) :

- SA testing of evidence documents;
- SA testing of masterplan design principles;
- SA testing of alternative site and land development options - this was, however, very much at an in-principle level of site (blocks of land) suitability for development and it did not look at proposed or possible specific uses or patterns of development on these land areas.

5.5 In the sustainability appraisal at the preferred approach stage of plan making the themes were looked at in turn and a commentary was provided against the approach applied as well as alternatives.

5.6 It should be noted that the Masterplan document of 2017 has been updated (both the text and the actual coloured in plan) to form a January 2019 version. The text has, however, changed very little. Therefore sustainability appraisal findings do not significantly change

between the two versions of the Masterplan. The SA text from the 2017 assessment has been updated and in amended form it now features in later chapters of this appraisal. In this chapter summary commentary is provided on appraisal at Preferred Approach stage of plan making.

5.7 The themes and issues in the Masterplan (past and current versions), are directly relevant to and inform the content of the Cranbrook Plan. However, it is stressed that as the Masterplan is not part of the Cranbrook Plan, it is supporting evidence behind the plan, it does not actually need to be subject to Sustainability Appraisal of the Cranbrook Plan. Notwithstanding that actual need to appraise commentary is included in this appraisal as it is seen as helpful in respect of assisting readers and users of the Cranbrook Plan and of this appraisal, as well as providing a means to report back on previous appraisal work.

SA of 2017 Masterplan evidence documents at Preferred Approach stage

5.8 The 2017 draft of the Masterplan (as now included in slightly amended form in the 2019 draft) included Chapter 2, which was specifically concerned with background evidence and evidence documents that informed the final Masterplan. In the SA at Preferred Approach stage of plan making these evidence sections of Chapter 2 were appraised in order comparing the recommended approach in the masterplan against identified alternative options. The key evidence sections of chapter 2 and specifically the main conclusions drawn from the SA at preferred Approach stage of plan making are summarised below. It is stressed that the summary is succinct and for a full picture the appraisal at Preferred Approach stage of plan making should be considered in full. It should also be noted that the first 'evidence' subject in the plan was in respect of promoting health and wellbeing. In the SA work this was taken as a given and a consideration that informed the Masterplan overall. Alternatives to promoting health and wellbeing outcomes (such as promoting poor health) were not considered viable alternative options and as such were not appraised.

Culture and Community

5.9 The Masterplan, drawing on a Cranbrook Cultural Strategy, promoted provision of a range facilities throughout Cranbrook, to include neighbourhood centres, civic spaces, a formal park and a country park. In the appraisal three options were considered

a) Provide the types of facilities identified in the Cultural Strategy;
b) Seek to provide a much greater range and quantity of facilities; and
c) To not have cultural or community facilities (or accept very few are provided).

5.10 The options of providing facilities, i.e. the first two options a) and b), not surprisingly, preformed much better against the range of sustainability objectives that not having facilities. The appraisal noted that there would be cost implications, however, with providing for a substantial range of facilities and this, whilst not explicitly tested in the SA process, could adversely impact on ability to secure monies to pay for other positive benefits associated with overall Cranbrook development. There could also be potential for over-provision of facilities.

5.11 The key positive impact benefits of providing facilities were in respect of sustainability objectives - 2 Community services, 3 Education and skills, 4 Health, 7 Leisure and recreation, 12 Sustainable transport ,19 Town Vitality & viability and 20 Inward investment.

In contrast non-provision of facilities scored negatively against these objectives, with significant negative impacts in respect of 2 Community services, 7 Leisure and recreation and 19 Town Vitality & viability.

5.12 The SA at Preferred Approach stage of plan making clearly endorsed an approach of provision of facilities, with provision of a substantial number performing better than lower levels, albeit noting cost considerations and potential for over-provision.

Economic Development and Provision of land for jobs

5.13 The masterplan, drawing on a Cranbrook economic development strategy, identified three key themes for promoting economic development and provision of land for jobs. These were, however, generated within the context of noting that there will be substantial job provision in surrounding areas, the themes were :

- supporting small and growing enterprises.
- creating employment and services
- building strong links with the Growth Point.

5.14 In the appraisal work three options were considered:

a) Distribute employment land evenly across Cranbrook – lots of small sites and plots for jobs;

b) Concentrate employment provision in just one or two large sites;

c) Have a mixture of distributed employment provision and some larger sites.

5.15 The appraisal work showed there were a number of positive benefits for all of the options measured against the SA objectives. Options a) and c) generated the greatest number of positive impacts, specifically to include - 4 Health, 12 Sustainable transport, 14 Greenhouse gas emissions, 18 Employment, and 20 Inward investment. Though it was noted that option a), in contrast to c), would be unlikely to promote SA objective 19 Town Vitality & viability. Option b) saw positive benefits against a number of these objectives though with uncertainty (?) against a number as well, including - 6 Noise (though this was common to all options), 9 Landscape character, 12 Sustainable transport and 14 Greenhouse gas emissions.

Education

5.16 The masterplan proposes two additional education campuses one each in the eastern and western expansion areas (noting the existing planned provision). The following possible policy approaches to supporting education provision at Cranbrook were identified:

a) To provide for two new primary schools, as proposed in the Masterplan, in the extension areas to the east and west of the current extent of the town;

b) To locate primary education provision in a more central area of the town.

5.17 Broadly speaking having two new primary schools on the eastern and western sides of the town compared to one (especially noting current existing provision in the existing

developed parts of Cranbrook) was identified as having a range of positive sustainability benefits, including - 2 Community services 3 Education and skills 4 Health, 7 Leisure and recreation, 12 Sustainable transport and 14 Greenhouse gas emissions. In contrast there were negatives against these objectives in respect of having just one school in a central area. The identified possible exception was in respect of promotion of positive town centre vitality benefits (SA Objective 20) that a central school may offer.

Transport and Movement

5.18 The Preferred Approach document was supported by a movement strategy that sets out a number of objectives, the masterplan advised that these include:

- Promote and improve sustainable travel (this specifically is taken to mean walking, cycling and public transport);
- Reduce traffic congestion and delays, and improve air quality on key routes into and out of Exeter City Centre, from the masterplan area, through a reduction in vehicle trip generation by encouraging a modal shift from the private car;
- Integrate new development sites with established communities to increase travel choice, based on comprehensive networks and linked facilities;
- Create the required conditions to support local employment opportunities that can be accessed by sustainable modes; and
- Improve accessibility throughout the area to encourage walking and cycling and improve health and wellbeing.

5.19 Drawing from these and wider considerations the following alternative options have been identified in respect of addressing on site transport considerations at Cranbrook and promotion of sustainable transport:

a) Promotion sustainable transport modes in Cranbrook – specifically based on a hierarchy in the order of – walking, cycling, public transport and private transport.

b) Not specifically promoting sustainable transport and not recognising a hierarchy of modes.

5.20 There were a range of positive sustainability benefits associated with option a) including in respect of SA Objectives – 2 community services, 4 Health, 7 Leisure 7, 10 Amenity and 14 reducing greenhouse gas emissions. Of greatest significance is, however, the significant positive in respect of the SA objective of promoting sustainable transport 12). There were no negative sustainability impacts identified with this option.

5.21 In contrast to the positives associated with promoting sustainable transport the non-promotion of sustainable transport (including with an expectation of a reliance on the private car) scored negatives against the range of sustainability objectives that sustainable transport proposals score positively against. In respect of 18 Employment and 20 inward investment uncertain responses are recorded. The ability to access shops by car might be a factor that could encourage more people to visit the town centre and this could have positive benefits, however and conversely, if Cranbrook is designed around easy movement of car driving then people might be tempted to drive out of Cranbrook to visit shops and commercial facilities with potential for adverse impacts.

5.22 In respect of off-site away from Cranbrook considerations a further two options were appraised;

a) Reduce car journey numbers and congestion and delays in to Exeter City Centre and encourage non-car travel modes.

b) Do nothing to reduce off site impacts and do not promote non-car modes of transport.

5.23 In respect of option a) the appraisal identified that there were a wide range of positive sustainability benefits associated with seeking to reduce congestion and car reliance for travel into Exeter. Positives are identified in respect of SA objectives – 2 community services, 3 Education, 4 Health, and 14 reducing greenhouse gas emissions. It was noted that provision of post-secondary education would be off-site from Cranbrook with many students potentially studying in Exeter. Of greatest significance is, however, the significant positive in respect of the SA objective 12 of promoting sustainable transport. There are no negative sustainability issues associated with this option.

5.24 In contrast to the positives associated with seeking to reduce congestion and car reliance for travel into Exeter the do-nothing option scored corresponding negatives against the sustainability objectives. In respect of SA objectives – 18 Employment and 20 inward investment uncertain scores were recorded as it is not known if or how actual road systems could cope with the extra demand.

Landscape and Visual Impact

5.25 Cranbrook is being built on a green field site and sits in an attractive landscape setting. The area of Cranbrook that has an existing planning permission, and also the Local Plan allocated land, is reasonably flat though on the easterly edge the ground rises quite sharply to form a visual separation from the village of Whimple. Rockbeare village lies to the south of Cranbrook and it sits at a lower level. The different height levels of Cranbrook (as built and committed at present) and Rockbeare village is such that although the two settlements are close, around 300 metres at the nearest point, there remains a definite visually separation.

5.26 The following possible policy approaches were identified in respect of landscape and future development impacts:

a) Accommodate future development in locations that are not prominent in the landscape specifically not from the villages of Rockbeare and Whimple (the two villages closest to Cranbrook); or

b) Accept that development can or should occur in visually prominent locations, specifically including in respect to visual prominence to nearby villages.

5.27 For most of the SA objectives the location of development, in terms of landscape considerations, has no direct bearing. Where there was an identified relevance was in respect of SA objectives 8 historic environment (noting historic buildings at Rockbeare and Whimple) and 10 Amenity; though most of all in respect of SA Objective 9 that deals with landscape concerns. It was option b) that saw potential for significance adverse impacts.

Open Space Sports Pitch Provision

5.28 Sports pitches and associated facilities can take up large areas of land and be expensive to maintain. However, participation in sporting activities promote health and wellbeing as well as being enjoyable in its own right.

5.29 Two approaches to the distribution of sports pitches were identified as reasonable alternatives:

a) Provide sports pitches over a number of sites comprising only one or two pitches on each and located throughout the town so that they are easily accessible to everyone, although they would only be able to provide limited facilities.

b) Provide large sports hubs in two (or perhaps more) locations which would have the potential to provide more and better pitches and also to provide club houses, changing facilities, social venues that would support sports clubs and enable other social events to take place.

5.30 There were identified positive comparative SA benefits associated with both approaches, although differences are not great. Option a) was seen as likely to have positive effects on the accessibility of sports facilities for the community (SA objective 2) and on levels of walking and cycling (SA objective 12) because more people would live within a short distance of a sports facility. Positive effects on health (SA objective 4) are also likely. However, each individual facility was seen as potentially being less high quality and the lack of associated facilities may deter some people from using them, which could have the opposite effect. The effects of option b) was seen as tending to be the opposite – while facilities may be less accessible, they could be more comprehensive which may encourage people to make more use of them.

5.31 In respect of direct impacts there could be a case that the sustainability effects would be most positive (but perhaps only marginally so) if a mix of sports facilities can be provided – some smaller and more dispersed and some larger and more comprehensive. This, however, would need to be set against other considerations, notably the costs of sports pitch provision and whist this is not a factor taken directly into account in the sustainability appraisal it is noted that economies of scale would be likely to make provision of a small number of big facilities a commercially more viable proposition than provision of many smaller facilities.

Suitable Alternative Natural Greenspace

5.32 Suitable Alternative Natural Green Spaces (SANGs) are areas that will be attractive recreation areas for residents, notably dog walkers and other uses/users that can have adverse impacts, to use instead of visiting the most significant wildlife sites. The Council have an agreed mitigation strategy to provide SANGS in the vicinity of Cranbrook and the Cranbrook Plan identifies a number of land areas that could contribute to fulfilling this role.

5.33 The following possible policy approaches are identified in respect of SANGS (see table at the end of this sub-section for appraisal of options against SA objectives):

a) Provide SANGs in and immediately next to Cranbrook.

b) Provide SANGs in the general vicinity of Cranbrook but not necessarily an easy walking distance.

5.34 The 2017 Masterplan took the approach outlined in Option a) whereas the alternative option b) would see SANGs provision on land that could be some distance form Cranbrook and might, for example, require a car drive to access it.

5.35 SANGs provision at or close to Cranbrook, Option a), scored significant positive benefits in respect of two SA objectives - 4 Health and 7 Leisure and Recreation. SANGs will provide spaces for people and dogs to get out and exercise in open areas. However SANGs close to the airport could suffer from adverse noise pollution (albeit watching airport activity could be attractive to some people). Uncertainty also applied to SA Objective 11 as whilst being SANGs could provide some scope for land to be subject to biodiversity improvements it will also be land that has a greater intensity of human and dog activity which could have adverse impacts.

5.36 For option b) it was identified that there was an element of an unknown as it is not specified where they may be, but on assumption that they could be some distance from Cranbrook and for this reason and hence less well used, two SA objectives - 4 Health and 7 Leisure and Recreation are (only) given positive impact scores. The potential for some or a greater degree of car use to access these sites generated negative scores against SA Objectives for – 12 Sustainable Transport and 14 greenhouse gas emissions.

Sustainable Urban Drainage

5.37 Sustainable Urban Drainage (SUDS) was referred to at the preferred approach stage of plan making as natural parts of the landscape that have the ability to store surface water such as ponds, swales and filter strips. This definition still holds true but terminology has changed to Sustainable Drainage Systems (SuDS). SUDS are typically used as an alternative to more conventional ways of managing floodwater such as rapidly piping it away.

5.38 The following possible policy approaches were identified in respect of use of SUDS (see table at the end of this sub-section for appraisal of options against SA objectives):

a) Incorporate SUDS into Cranbrook.

b) To not use SUDS and rely on conventional hard engineering solutions.

5.39 The use of SUDS, option a), scored positively against a range of Sustainability Objectives, specifically - 9 Landscape, 11 Biodiversity, 13 Air, soil and water and 15 flood risk. As a technical response to flooding concerns, option b), also scored positively against the flood risk objective.

5.40 The SA at Preferred Approach stage noted that SUDS schemes can be quite land intensive and if or where not used as the favoured means to deal with flood water they could potentially offer scope for land to be used for other purposes including more development.

Overhead Power Lines

5.41 The eastern expansion area and land to the south of it have two overhead power lines that cut across the site. The Preferred Approach appraisal reported that both lines are held on steel lattice towers which are quite visually prominent and the land beneath and 15 metres either side of them cannot be developed whilst they remain in place. The Cranbrook Plan proposed partial undergrounding of one of the lines. This work was identified as 'freeing-up' over 3 hectares of land for development that would not otherwise be available

5.42 The following possible policy approaches are identified in respect of SANGS (see table at the end of this sub-section for appraisal of options against SA objectives):

a) To partially underground one of the cables.

b) To not underground the cable.

5.43 The undergrounding of the length of cable was identified as having positive impacts against the following SA Objectives – 1 Housing, 9 Landscape character and 10 amenity. To not do so scored negative impacts.

Gypsy and travellers

5.44 The 2017 masterplan identified two sites for the provision of gypsy and traveller pitches. These are to be located on the edges of the town where access to services and facilities as well as the wider road network are available. It was anticipated that the sites will accommodate a mixture of permanent and transit pitches but that the total number of pitches will be less than that envisaged by the Local Plan.

5.45 In terms of locating gypsy sites a Cranbrook there were a range of possible options as identified below:

a) A single large site;

b) A small number (say two) medium sized sites;

c) A large number of very small sites.

5.46 In the context of the above, and at the Preferred Approach stage, assessment was not extended to quantify the actual number of pitches, in total, that should be provided for Cranbrook. It should be noted that in representation on the SA (see later on in this chapter) comment was made that off-site provision should have also been tested. In the SA work at and for Publication stage (see chapters further on in this appraisal) off-site provision is also tested.

5.47 The provision of pitches in any location was seen as having positive effects on housing (SA objective 1), especially if enough are developed to meet the identified need of gypsies and travellers. The location of the sites within Cranbrook was seen as influencing many of the SA objectives as it would determine how accessible sites are to schools, community facilities, jobs and sustainable transport links. Effects on many of the SA objectives will be more positive where pitches are well-connected and levels of car use can be lower. Larger sites were considered to be likely to be more visible and therefore more likely to affect

landscape character (SA objective 9) and the setting of heritage assets (SA objective 8); however fewer sites may be provided overall if they are larger in size which could also reduce the likelihood of impacts on those SA objectives. Conversely, smaller sites may be less visible but there would be more sites overall; therefore increasing the likelihood of heritage assets and the landscape being affected, although these impacts could be mitigated through good design of sites. There can be concerns (real or perceived) of crime (SA objective 5) associated with gypsy site provision and it was identified as possible that on a larger site the concerns might be disproportionately greater

Noise

5.48 Airport noise, and the potential for adverse health impacts that noise can have, was seen as a factor of critical importance for the future development of Cranbrook. Furthermore, beyond being an actual health issue and a causal poor health determining factor, noise can also be a nuisance and disagreeable. The Civil Aviation Authority issued a report in 2016 - Aircraft noise and health effects: Recent findings - CAP 1278 that highlighted health impacts from aircraft noise and East Devon District Council commissioned advice from Bickerdike Allen on noise emissions from Exeter airport. This report was specifically commissioned to inform determination of the planning application submitted by EDNCp but it does have explicit relevance to Cranbrook Plan policy in respect of noise issues and particularly for the allocation of land for development.

5.49 The most critical issue in respect of noise is whether development, especially new housing, should be allowed close to Exeter airport noting noise levels generated by and from the airport.

5.50 The following possible approaches in respect of airport noise considerations were assessed (see table at the end of this sub-section for appraisal of options against SA objectives):

a) Build in areas that are compliant with standards promoted by EDNCp as they advise are set out in the Noise Policy Statement for England;

b) Build up to but not beyond areas that are compliant with World Health Organisation noise limits – 55 dB;

c) Build in areas that are less noisy than the above.

5.51 It was identified in the Preferred Approach appraisal that option a) would allow for development, specifically new houses, closest to the airport (up to/close to the operational boundary of the airport) and in areas that receive the greatest noise levels. This option would result in houses being built in areas that exceed a 55 dB noise level.

5.52 Option b) would draw housing development away, to the north of the airport, and at its closest around 750 metres from the runway and beyond a 55 dB line.

5.53 A more rigorous (less noisy) standard, option c) would see new housing even further away, to the north of the airport. For the Preferred Approach SA work a possible decibel boundary for this option was not defined but if this restrictive approach was applied it could,

for example, place significant if not total limits on westerly Cranbrook development to the south of London Road.

5.54 The SA work was premised on assessment that development (specifically including housing development) in areas that exceed World Health Organisation 55 dB levels is inappropriate. This perspective directly informs commentary and assessment.

5.55 Taking the noise issues in isolation each alternative option appraised records the same conclusions for most SA objectives; most of the SA objectives are not explicitly influenced by noise.

5.56 However, Option a) for SA objectives 1, 3, 4 and 6 (all of which in SEA regulation terms relate to population and health) record the greatest negative impacts. For these four SA objectives the double negative - - of "The option or policy is likely to have a significant negative effect on the SA objective(s)" are recorded. This conclusion was based on the wider council evidence and interpretation relating to noise impacts. In respect of SA objective 3 the concern would be specifically relevant should any outdoor school spaces (e.g. playgrounds or outdoor classrooms) be in the noisy areas.

5.57 Option b) scored lower than a) but still has single negative impacts "The option or policy is likely to have a negative effect on the SA objective(s)" for SA objectives 1, 3, 4 and 6. These impacts are, however, seen to be more related to nuisance considerations (the noise is somewhat disagreeable) rather than actual adverse health impacts.

5.58 Option c), by avoiding the nosiest areas clearly has the least potential identified adverse impacts.

Spatial and other conclusions from testing underlying principles

5.59 From the appraisal of evidence at the preferred Approach stage of plan making, as summarised above, the SA identified a number of favoured options and approaches to the spatial distribution of further development at Cranbrook.

5.60 Airport noise, landscape considerations and floodplains were identified as critical considerations in determining the extent of land that might have scope for accommodating further development. Areas with significant landscape and airport noise constraints were seen through the SA and wider work as being at or close to being absolute constraint on development. The option of building on the floodplain was not tested through the SA work as it was taken as an absolute constraint in its own right.

5.61 Building north of the Exeter Waterloo railway line, specifically for anything that is of a strategic or large scale, is seen as a theoretically possible option but had not been considered in detail in this SA work (bar for an area of land recorded Lodge Trading Estate) on account of significant floodplain constraints and because there are large tracts of land that are in National Trust ownership. Furthermore the Preferred Approach work identified that any new vehicular crossing of the railway, which strategic or large scale development would require, would be extremely expensive (if not prohibitively so).

5.62 The Preferred Approach work identified two larger scale potential areas of search for future Cranbrook expansion, one to the south east and one to the south west. The work

identified, however, the likelihood of limits to how far southward or westward development should be accommodated, as constrained by airport noise and landscape considerations.

5.63 To the south east of Cranbrook, south of London Road, the constraints to development were identified as less pronounced. There is not the aircraft noise to contend with and land is flatter in profile, other than where it is closer to the village of Rockbeare and there is visual connectivity between the village and potential development land. But it was identified that the further south and east any development were to go the further away from and hence more remotely located it would be from core facilities, including the town centre of Cranbrook.

SA of 2017 Masterplan design principles at Preferred Approach stage

5.64 The SA at Preferred Approach stage of plan making (see Chapter 6 of the past appraisal) considered design principle set out in chapter 3 of the 2017 Cranbrook masterplan. The Cranbrook Plan established seven principle that have been informed by the key evidence. The design principles are similar in nature to plan objectives, though as it is a Masterplan that they inform they are very much orientated towards and around the spatial location of development rather than the broader range of considerations that may feature in a more comprehensive planning policy document. Under each design principle there were a series of bullet points that set out how the principle was been translated into spatially relevant considerations. The bullet point considerations were compared against the SA objectives through alternative options were not considered.

Principle 1: Compact urban form

5.65 Broadly speaking the principle of securing a compact urban form was be seen to have some positive sustainability impacts where assessed against the sustainability objectives. Objectives relating to provision and accessibility to community services (notable objectives 2 and 7) and those relating to encouraging walking and cycling and reducing greenhouse gas emissions (objectives 12 and 14) scored positively, as did health (objective 4). Under the first of the bullet points there was a question mark against SA Objective 9 as there is some uncertainty identified in respect of potential adverse impacts. Compact forms of development, if implemented badly, could result in tree and vegetation loss, possible other adverse impacts and ‘cramming’ development into limited spaces.

Principle 2: Higher density housing and amenities close to the key movement corridors

5.66 The bullet points under Principle 2 were, for the most part, identified as generating either positive or negligible impacts against the Sustainability Objectives. Land is allocated for the eastward and westward expansion of Cranbrook in the Local Plan and so, in principle, decisions about future growth in these general directions is already determined by policy. By locating neighbourhood centres to both the east and west of Cranbrook (as it currently exist) will ensure that most residents of the town should have good or reasonable access, specifically pedestrian access, to the facilities that neighbourhood centres will offer.

5.67 By having higher density housing development closer to the centres it should reinforce the positive benefits of more people being in closer proximity to the centres. Significant positive benefits are identified against SA objectives 18 and 20 in respect of promoting

employment growth and having provision at neighbourhood centres. Adverse noise impacts, Objective 6, could arise if neighbourhood centres generate a lot of activity that is too close to noise sensitive uses and similar potential for adverse impacts could apply in respect of SA objective 9, 10 and 11 – landscape, amenity and biodiversity.

5.68 With higher density housing close to neighbourhood centres it was identified that there could be adverse impacts from the mass and scale of development unless carefully planned for.

Principle 3: Strong links between Cranbrook, Cranbrook station and employment areas

5.69 Principle 3 relates to links between Cranbrook and close by strategic employment areas. The bullet points scored highly when measured against employment and economic growth objectives, notably SA objective 18. Against other SA objectives impacts were identified as negligible though uncertain question marks appeared against objective 10 relating to amenity. Employment uses, at their most intrusive, can cause some disruption to other neighbouring uses, though 'bad-neighbour' employment activities are far less prevalent than might have been the case in years gone by and also with careful planning and development spaces can be developed to avoid adverse impacts.

Principle 4: The identity of Cranbrook shall be informed by landscape features and character

5.70 Principle 4 was explicitly concerned with how landscape consideration and constraints have informed the Cranbrook Masterplan. It might also have been reasonable to show wider direct impacts on other SA objectives, such as health, SA Objective 4. Whilst these have been recorded as negligible in direct terms the implementation of the objective could be expected to have indirect positive effects in respect of the objective.

Principle 5: Attractive pedestrian and cycle routes for commuting and leisure

5.71 Principle 5 set out objectives relating to safe and attractive pedestrian and cycle routes and encouraging these modes of travel. Measured against a range of SA objectives these were a wide range of significant positive benefits, specifically SA Objectives for Health (4), leisure and recreation (7) and Sustainable Transport (12). Positives were also recorded in respect of SA objectives for Community Services (2), Education (3), Greenhouse gas emissions (14) and Energy efficiency (16).

Principle 6: Integration with public transport

5.72 Principle 6 is in respect of integration with public transport and has one bullet point of "The movement strategy (Urban Engineering Studio, August 2017) identifies a new local bus service which would connect to the rail station and a new bus service to Exeter City Centre." This recorded significant positive impacts on respect of SA Objective for Sustainable Travel (12). There are, however, also positive impacts in respect of Community Services (2), Education and Skills (3) and health (4).

Principle 7: Health provision

5.73 Principle 7 is in respect health provision with a single bullet point of "It is anticipated that health and wellbeing hubs shall be co-located with other community and cultural activities within neighbourhood centres." On assumption that this means there actually should and will be facilities in neighbourhood centres this bullet point scored a significant positive against the SA health objective (4). It scored positives against Community services (2) by providing accessible facilities close to where people will live and Greenhous Gas Emissions (14) on account of meaning that travel journeys to visit facilities can be expected to be shorter. Over and above these positives further positive benefits were identified in respect of Employment (18) on account of jobs that will be associated with provision and vitality and viability (19) by encouraging people to visit and uses centres and facilities.

Conclusion on SA Testing of Design Principles

5.74 The SA testing of design principles at Preferred Approach stage of plan making indicated a generally broad picture of sustainability benefits arising from their implementation.

SA testing of alternative site and land development options at Preferred Approach stage

5.75 At the Preferred Approach stage of appraisal (see chapter 7 of that appraisal) alternative site development options were assessed. Blocks and areas of land were looked at in respect of their potential suitability for development. The exercise that was undertaken has been repeated and expanded on in respect of potential site choices for the publication stage of plan appraisal, this work follows on later in this assessment report.

5.76 Land around Cranbrook that had been promoted by land owners and agents for development was assessed, in total 25 sites or blocks of land featured in the assessment. The SA work and the comparative impacts measured against the sustainability impacts confirmed an overall appropriateness of the areas identified for built development in the 2017 Masterplan. Landscape impact considerations were key to informing the Masterplan and through the SA work a number of sites on or close to the periphery of Cranbrook, especially on the southern side and south of London Road performed quite significantly less well than other options. On the eastern and western fringes of Cranbrook, beyond the Local Plan allocated sites, a number of smaller scale sites scored reasonably well though there are clear concerns in respect of the ability of these sites to support and secure infrastructure and facilities alongside housing development.

SA testing of proposed policies at Preferred Approach stage

5.77 The Preferred Approach stage of plan making included a standalone report that set out possible policy areas for inclusion in the Cranbrook Plan. Chapter 8 of the SA at Preferred Approach stage of plan making appraised these policy options in comparison with alternative possible policy options.

5.78 In total 34 separate policy approaches were tested in the SA at Preferred Approach stage of plan making. It should be noted for the Publication plan this number has reduced down to 29 policies. A detailed commentary on assessment of polices at the Preferred Approach

stage of plan making is not included in this SA publication report so for a full picture of past work the previous assessment should be referred to. However, it should be noted that in a later chapter of this SA there is a table that compares policies in the publication plan against those in the Preferred Approach document. The table shows which policies are common to the two plans (Preferred Approach and Publication), which are new to the publication draft and which have been dropped form the Preferred Approach document and not made it to the publication plan.

5.79 The policies at Preferred Approach built on the masterplan evidence and their appraisal, compared to identified alternatives (where appraising alternatives was seen as appropriate) showed, broadly speaking, positive impacts arising from their inclusion in the plan.

Comments received on the SA at Preferred Approach stage consultation

5.80 The Preferred Approach SA report was made available for public comment alongside the actual Preferred Approach documents. The table below summarises comments received and also provides an East Devon District Council officer commentary on the points raised.

5.81 There were a small number of matters raised (some relating to matters of detail or accuracy) in comments received. It should be noted that comments are only recorded where the respondent made specific reference to the SA report. It is noted that in response to the Preferred Approach document (as opposed to the SA of it) a large number of respondents made comment on sustainable development matters, these comments are not however logged and commented on this specific SA specific element of work.

Table 5.1: Summary of consultation feedback on the SA of the Preferred Approach report

Comment by	Subject matter and summary of Comments made on the SA Preferred Approach stage of plan making (and web link to original submission)	East Devon District Council - Officer Response
East Devon New Community Partners	It is noted, paragraph 2.9 of the representation, that the SA confirms that Cranbrook represents the most sustainable development opportunity in the District. See: http://eastdevon.gov.uk/planning-libraries/cranbrook-plan-pa-2017-18/davidlockassociates.pdf	It is noted that Cranbrook, developed appropriately, will contribute to sustainable development objectives for East Devon.
East Devon New Community Partners	At paragraph 4.2 of the representation, it is welcomed that sustainability appraisal, in Appendix 3, provides clarity on average housing density built at Cranbrook to date, at around 40-42 dwellings per hectare. See: http://eastdevon.gov.uk/planning-libraries/cranbrook-plan-pa-2017-18/davidlockassociates.pdf	This point is noted as is the fact that it forms a net density measurement (on the basis, as noted in the submission, that strategic highways and accesses, significant landscaping, playing fields, schools, community uses, play areas and other non-residential uses are excluded from the calculation).
East Devon New Community Partners	In cross-referencing to the SA work (paragraph 6.9 in the SA and paragraph 4.10 of their submission) concern is expressed that proposed density at Blue Hayes, 40 to 50 dwellings per hectare, is too high. See: http://eastdevon.gov.uk/planning-libraries/cranbrook-plan-pa-2017-18/davidlockassociates.pdf	Through new and ongoing plan making work, specifically in respect of the preparation and refinement of the Masterplan, density levels at Blue Hayes have been reviewed and assessed to identify appropriate levels and amounts of development to accommodate in plan policy.
East Devon New Community Partners	In paragraph 8.7 of their submission objection is raised to provision for gypsies and travellers not being met through a contribution to off-site provision. Objection is raised that the SA did not consider this option. See: http://eastdevon.gov.uk/planning-libraries/cranbrook-plan-pa-2017-18/davidlockassociates.pdf	In the SA of the publication draft of the plan consideration, as an option, is given to appropriateness of a policy approach that seeks a contribution to off-site provision of gypsy and traveller accommodation. Appraisal of this option is shown in Table 6.11 and in accompanying text.
Devon County Council	In representation it is advised that "It is recommended that the section entitled 'Sustainable Urban Drainage' is renamed as "Sustainable Drainage Systems (SuDS)' to reflect current practice." See: http://eastdevon.gov.uk/planning-libraries/cranbrook-plan-pa-2017-18/devoncountycouncil.pdf	It is agreed and amendment to wording has been made at this Publication stage of SA work.

Comment by	Subject matter and summary of Comments made on the SA Preferred Approach stage of plan making (and web link to original submission)	East Devon District Council - Officer Response
Environment Agency	The Environment Agency advise that: *"One of the key measures of achieving sustainable development as set out in NPPF (page 21) relates to 'Meeting the challenge of climate change, flooding and coastal change'. Accordingly we would expect any Sustainability Appraisal (SA) to make particular reference to this topic and address the matter of flooding, and the predicted impacts of climate change upon flooding, in a forthright manner. This may be by reference to policies contained in the East Devon Local Plan and NPPF but it appears that this SA does not do this."* See: http://eastdevon.gov.uk/planning-libraries/cranbrook-plan-pa-2017-18/environmentagency.pdf	The review of Plans, Policies and Programmes in this appraisal, see Chapter 3, has been updated to more explicitly refer to flooding considerations and SA Objective 15 "To ensure that there is no increase in the risk of flooding" is specifically concerned with flooding matters. It is also highlighted that Cranbrook Masterplan work and the Cranbrook Plan policies address flooding matters.
Somerset County Council	Somerset County Council, in their submission, comment that: "*A specific SA objective is listed in Table 2.2 as 'To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution' and 3.26 identifies airport noise as a significant concern. The SA however makes no reference to the noise impacts associated with the railway or 'the busy and fast flowing traffic on London Road' (8.21) and makes no reference to Professional Practice Guidance on Planning and Noise ProPG."* See: http://eastdevon.gov.uk/planning-libraries/cranbrook-plan-pa-2017-18/somersetcountycouncil.pdf	It is noted and recognised that there are sources of noise that could cause a nuisance, other than the airport. Albeit these non-airport sources (specifically roads and the railway) are not as significant as aircraft noise concerns. The appraisal of Policies allocating land for expansion areas has been updated in the SA work on the Publication version of the plan to reflect minor negative effect in relation to SA6 (noise).
Somerset County Council	Somerset County Council, in their submission, comment that: *"Section 4.21 of Sustainability Appraisal (SA) of the Cranbrook Masterplan (November 2017) indicates there are conflicting opinions between those that wish to develop property near to the airport boundary (East Devon New Community Partners - EDNCp) and East Devon District Council (EDDC) who wish to adopt a more precautionary approach and avoid development nearer to the airport noise. In the view of the County Council Acoustics Specialist there would appear merit in the EDDC approach if the aim of the plan is to minimise impacts* to residents and safeguard options for further airport development." See: http://eastdevon.gov.uk/planning-libraries/cranbrook-plan-pa-2017-18/somersetcountycouncil.pdf	The view expressed by Somerset County Council is agreed with and this is reflected in the policy approach set out in the plan and in the SA work.

Comment by	Subject matter and summary of Comments made on the SA Preferred Approach stage of plan making (and web link to original submission)	East Devon District Council - Officer Response
University of Exeter Centre for Energy and Environment	Concern is expressed in Item 14, table 9.1 of the SA work, that the objective *"To contribute towards a reduction in local emissions of greenhouse gases", suggests an indicator of "renewable energy capacity installed by type". This should be amended to "renewable energy generation in kWh by type over a monitoring period" as it is the amount of energy generated, not the potential capacity to generate it, which indicates greenhouse gas emission reduction.* *Item 16 in the table 9.1 "To ensure energy consumption is as efficient as possible" suggests the same indicator of "renewable energy capacity installed by type". Renewable energy capacity is not a measure of consumption efficiency and is not the correct indicator for this objective. The objective itself is very broad when considering all energy used at Cranbrook i.e. electricity, heat and transport fuel. Energy efficiency in this context will be determined by many factors which are likely to be too complicated to monitor. I would suggest that the objective is amended to "to ensure that the energy efficiency of buildings is as high as possible".* See: http://eastdevon.gov.uk/planning-libraries/cranbrook-plan-pa-2017-18/universityofexetercentreforenergyandenvironment.pdf	It is agreed that it would be beneficial to amend the suggested indicators to also include a new addition to read "Renewable energy generation in kWh by type over a monitoring period." However it is not necessarily fully clear if and how this information may be collected. And whilst noting the limitations, as reflected in critical comment, of the indicator of "Renewable energy capacity installed by type" it is seen as useful to retain this indicator. It would, however, be inappropriate to amend SA objective 14 at this stage of plan making. To do so may necessitate retrospective (and confusing) retesting of past work, but more importantly the objective is appropriately broad brush and ranging in nature, recognising the multitude of emission sources. In this respect it is more valuable than (just) considering energy efficiency of buildings only.

6 SA testing of the 2019 Masterplan evidence

6.1 This chapter of the SA moves on from past plan making work, and its appraisal, to focus on the current 2019 Publication stage of plan making work. In this chapter of the SA assessment is made of Chapter 2 of the 2019 redraft of the Masterplan. It is reiterated that the Masterplan is not part of the Cranbrook DPD, it is evidence that has informed the DPD, but it was seen as beneficial for it to be appraised.

6.2 Chapter 2 or the 2017 Masterplan, as retained as Chapter 2 of the new 2019 Masterplan, contained a series of thematic headings that covered key subject matters and the evidence that helped inform the mapping and layout work in the masterplan document. It should be noted that there were minor tweaks to the masterplan text from the 2017 draft to the 2019 draft but substantive changes were not made.

6.3 The sub-sections below provide commentary on and appraisal of evidence based sections of the 2019 Cranbrook Masterplan.

Health and wellbeing (and introduction)

6.4 The Cranbrook Masterplan contains (at the start of Chapter 2) an introductory section that introduces the overarching theme of health and wellbeing that runs throughout masterplan. The objective that Cranbrook should be a healthy town has been taken as a given and therefore it was not seen as appropriate to assess alternative options; for example it was seen as appropriate to assess an objective that planned for the residents of Cranbrook to be unhealthy. However, health and wellbeing aspirations can impact on many other issues and considerations and can be promoted and secured in different ways. The overall appraisal therefore take into account this cross-cutting theme.

6.5 The masterplan identifies four key themes determining how Cranbrook should function from a health and wellbeing perspective, these are:

- Transport and movement
- Urban Design – Town Centre
- Urban Design – Street Design
- Urban Design – Blue and Green Infrastructure

The text advises that:

> *"Masterplanning considerations include the provision of linked green spaces; safe neighbourhood and community spaces; efficient and well located community facilities; accessible spaces; space for edible landscapes/ food production and local markets; and integrated transport provision."*

6.6 Whilst results are not set out in tabulated format the expectation would be of significant positive impacts in respect of SA Objectives for community services (Objective 2), health (Objective 4) and leisure and recreation (Objective 7).

Culture and Community

6.7 The Cranbrook Plan advises of there being a cultural development strategy for the new town[13]. This sets out objectives around local distinctiveness, walkable neighbourhoods and identity, it also provides community facilities, spaces and meeting/activity spaces.

6.8 The Cranbrook plan has been developed to confirm provision of facilities and in some case show location of such facilities.

Alternative Options

6.9 The following possible policy approaches to providing (or not providing) facilities at Cranbrook are identified (see table at the end of this sub-section for appraisal of options against SA objectives):

a) Provide the types of facilities identified in the Cultural Strategy;

b) Seek to provide a much greater range and quantity of facilities;

c) To not have cultural or community facilities (or accept very few are provided).

6.10 The table at the end of this section compares these options against the sustainability objectives.

Direct impacts

6.11 Not surprisingly Options a) and b), which would provide for facilities, see positive direct sustainability benefits against a number of the objectives. Option c) that does not provide for facilities would have negative impacts. By providing more or a greater range of facilities (or at least seeking to provide more) option b) scores a number of double positives as opposed to single positives for Option a). The scale of the positives (and negatives) set out in the table is open to some degree of interpretation and also imprecision as (by design) the appraisal does not seek to quantify levels but rather establishes a general picture and overview.

6.12 The specific greatest positives associated with both options a) and b) and corresponding greatest negatives for option c) are in respect of access to community services (objective 2), leisure and recreation (objective 7) and vitality and viability (objective 19). The first two are directly about facilities and people being able to use them and the final one about places and how they work. Clearly under Option c) people would have not have easy access to facilities and to reach them, if they were able, would have to travel longer distances or out of Cranbrook (hence negatives for sustainable transport and greenhouse gas emissions (12 and 14).

6.13 In respect of Option b), providing the greatest number of facilities, there is the issue of cost attached and the financial viability of high levels of provision and operation. Available monies to pay for facilities (and provision of facilities compared to other services or plan

[13] See documents at: http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-preferred-approach-evidence-base/#article-content

objectives) will invariably be a consideration for the new town. There is, however, also a danger that we with too many facilities there could be over-supply and that they end up being under used. Leaving aside financial considerations too much underuse could also have wider negative impacts including risk of vandalism and crime or under action or investment in maintenance.

Secondary, cumulative and synergistic impacts

6.14 Provision of facilities, option a) and b), could be expected to have positive secondary, cumulative and synergistic benefits as well as direct benefits. For example as a 'by product' in participating in events that places will provide for people's health can be expected to be improved and people being activity and out and about in Cranbrook can be expected to add to the overall quality of place.

Permanence and Timescale of impacts

6.15 Benefits of facility provision, options a) and b), can be expected to have a long term impact but also it is important for early provision to ensure immediate accessibility and to help establish patterns of use at the outset of provision.

Scope for Mitigation

6.16 The negatives associated with option c), not having facilities, could be challenging to mitigate against. To some degree it would require people to leave Cranbrook to access facilities but also it might simply be that there is less participation in activities and people maybe make their own entertainment in their home. In respect of vitality considerations at town and neighbourhood centres the lack of facilities could substantially reduce their overall appeal and visitor levels and this could have wider adverse impacts on the appeal of such centres for other activities and services, such as shops. It is not clear what mitigation might be possible.

Table 6.2 - SA appraisal of alternative options for culture

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a) Provide the types of facilities identified in the Cultural Strategy	0	+	+	+	0	0	+	0	0	0	0	+	0	0	0	0	0	0	+	+
b) Seek to provide a much greater range and quantity of facilities	0	++	+	+	0	0	++	0	0	0	0	+	0	0	0	0	0	0	++	+
c) To not have cultural or community facilities (or accept very few are provided)	0	--	0	0	0	0	--	0	0	0	0	-	0	-	0	0	0	0	--	-

Economic development and provision of land for jobs

6.17 There is an Economic development Strategy[14] for Cranbrook that looks at the factors that will build success and create a strong sense of place. It proposes that Cranbrook should create a significant proportion of its own economic activity - keeping wealth in the town and providing services that the local community needs. However, given the major employment sites close by, and the competition from Exeter, it is proposed in the strategy that Cranbrook concentrates on three themes:

- supporting small and growing enterprises.
- creating employment and services
- building strong links with the Growth Point

6.18 The strategies sees these themes as providing an economic role for Cranbrook to complement the rest of the Growth Point and which offers real benefits for a growing town. Outcomes sought for Cranbrook include promoting jobs and local employment opportunities for residents. Whilst there will be a substantial number of jobs in the nearby Skypark business park, Science park and elsewhere, including Exeter City, it is also seen as desirable for the future wellbeing of Cranbrook that it should support employment. Local Plan policy and the Preferred Approach Cranbrook Masterplan set out a requirement for 18.4 hectares of employment land at Cranbrook.

6.19 The following possible policy approaches to supporting jobs at Cranbrook were identified at preferred approach consultation;

a) Distribute employment land evenly across Cranbrook – lots of small sites and plots for jobs;

b) Concentrate employment provision in just one or two large sites;

c) Have a mixture of distributed employment provision and some larger sites.

6.20 In respect of options b) and c) it was assumed that one of the concentrations of employment land would be in the town centre of Cranbrook. In the Preferred Approach Masterplan itself option c) is followed with most of the provision, around 12 hectares, in the town centre, and additional larger provision in the south west of the town close to Skypark.

6.21 All of the options for the distribution of employment land have some identified positive benefits and some unknowns, most notably in respect of noise. Certain types of employment activities, especially where badly sited, can potentially have adverse noise (objective 6) impacts and it would not necessarily matter whether they are distributed widely or concentrated in specific locations. Having a degree of distribution of employment land (options a and c) should have the attraction of offering scope for jobs close to where people live and as such this should promote objectives relating to health, transport and greenhouse gas emissions (SA objectives 4, 12 and 14). All of the options should record positive economy related outputs (SA objectives 18, 19 and 20), though the dispersed

[14] See documents at;
http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-preferred-approach-evidence-base/#article-content

option (a) might not have a critical mass of employment uses in the town centre (relating to SA Objective 20) and therefore a negligible score for this option against this objective is recorded.

6.22 The secondary, cumulative and synergistic benefits associated with employment provision will be tied into many of the wider plan objectives. Whilst employment activities will not, for example, necessarily directly impact on community services what the presence of jobs in certain locations will do is increase the number of people in those locations that potentially will support service and create a demand for their existence and this will offer scope to help support them. These types of benefits could be expected in other objectives where a mass of people will have positive impacts.

Permanence and timescale of impacts

6.23 Positive impacts of job provision can be expected to have immediate impacts but these, more critically should be long lasting and permanent.

Scope for mitigation

6.24 The potential negatives (or questions marks) against job provision are most likely to arise, if they occur, where sites or schemes are poorly located or managed. Noise can be one such issue but also, and in specifically in respect of large sites, is the potential for adverse landscape impacts (SA Objective 9). Large employment sites can require levelling of substantial areas of land and where poorly located and undertaken, without for example careful planting, the works involved can have significant adverse landscape impacts. Large sites should, also, be carefully positioned to ensure that they enjoy good public transport accessibility or public transport is planned as part of the development, though this is likely to be far less of a concern for town centre development which should be well served by public transport.

Table 6.3 - SA appraisal of alternative options for economic development

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a) Distribute employment land evenly across Cranbrook – lots of small sites and plots for jobs;	0	0	0	+	0	?	0	0	0	0	0	+	0	+	0	0	0	+	0	+
b) Concentrate employment provision in just one or two large sites;	0	0	0	0	0	?	0	0	?	0	0	?	0	?	0	0	0	+	+	+
c) Have a mixture of distributed employment provision and some larger sites.	0	0	0	+	0	?	0	0	?	0	0	+	0	+	0	0	0	+	+	+

Education

6.25 The masterplan proposes two additional education campuses one each in the eastern and western expansion areas. Based on predicted pupil numbers it is envisaged that each of these campuses would accommodate a two form entry primary school and a special educational needs school would also be accommodated in the campus at the eastern expansion area. Land is already set aside at the existing Cranbrook Education Campus which would allow for the remaining places to be provided.

6.26 The excellent public transport services at Cranbrook will provide access to further education places available in Exeter and the surrounding area.

Alternative Options

6.27 The following possible policy approaches to supporting education provision at Cranbrook are identified (see table at the end of this sub-section for appraisal of options against SA objectives):

a) To provide for two new primary schools, as proposed in the Masterplan, in the extension areas to the east and west of the current extent of the town;

b) To locate primary education provision in a more central area of the town.

6.28 In respect of education provision there would, in theory, be other possible scope for provision. These could include:

- More primary schools – for example four one form entry schools – but this is understood to be contrary to Devon County Council expectation (as education Authority);
- Do not have schools at Cranbrook – but this would not accord with school provision practice.
- Make additional provision for a further secondary school – the first one is, however, designed around projected needs from future house building.
- Plan for post school/further education provision – but there is no known aspirations or expectations of a further education provider- to locate at Cranbrook.

6.29 There are therefore limited options for Cranbrook, hence the two appraised in the table at the end of this section as the reasonable alternative compared against the sustainability objectives.

Direct impacts

6.30 Broadly speaking having two new primary schools on the eastern and western sides of the town compared to one (especially noting current existing provision in the existing developed parts of Cranbrook) is identified as having a range of positive sustainability benefits against negatives, for the most part, for a single school in a central area. The

identified possible exception is in respect of promotion of positive town centre vitality benefits (SA Objective 20) that a central school may offer. Any scope for such a benefit would need to be seen against the accessibility and community benefits the primary schools would offer if located close to where people live and can access on foot in the extension areas of Cranbrook to the east and west.

Secondary, cumulative and synergistic impacts relating to education provision

6.31 Primary school provision in general can be seen to have secondary, cumulative and synergistic benefits associated with education provision and the role that schools can play in terms of social cohesion and to some degree offering community facilities. By having schools closer to communities and residents the scope for such benefits are enhanced.

Permanence and Timescale of impacts

6.32 Positive impacts of school provision will take time to be implemented but should be long lasting and permanent.

Scope for Mitigation

6.33 If there are not schools in close proximity to where people live it would necessity greater travel and mitigation could require extra (school specific) public transport provision, there could also be the need to seek ways to mitigate against adverse impacts that local communities and neighbourhoods may feel from not having a school and this may suggest a need for other types of community facility provision.

Table 6.4 - SA appraisal of alternative options for education

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a) To provide for two new primary schools, as proposed in the Masterplan, in the extension areas to the east and west of the current extent of the town	0	+	+	+	0	0	+	0	0	0	0	+	0	+	0	0	0	0	0	0
b) To locate primary education provision in a more central area of the town	0	-	-	0	0	0	-	0	0	0	0	-	0	-	0	0	0	0	+	0

Transport and Movement

6.34 A movement strategy has been prepared for Cranbrook[15] that sets out a number of objectives, the masterplan advises that these include:

- Promote and improve sustainable travel (this specifically is taken to mean walking, cycling and public transport);
- Reduce traffic congestion and delays, and improve air quality on key routes into and out of Exeter City Centre, from the masterplan area, through a reduction in vehicle trip generation by encouraging a modal shift from the private car;
- Integrate new development sites with established communities to increase travel choice, based on comprehensive networks and linked facilities;
- Create the required conditions to support local employment opportunities that can be accessed by sustainable modes; and
- Improve accessibility throughout the area to encourage walking and cycling and improve health and wellbeing.

6.35 Whilst the objectives cover a range of matters they can be reduced down, in respect of sustainability appraisal, to two key considerations:

- **On-site at Cranbrook** – the role and importance of promoting sustainable transport modes; and
- **Off-site away from Cranbrook** – approaches to links to surrounding areas – specifically reduce traffic congestion and delays, and improve air quality on key routes into and out of Exeter City Centre, from the masterplan area, through a reduction in vehicle trip generation by encouraging a modal shift from the private car.

6.36 No alternative approaches are considered in respect of the considerations (noting that objectives around local employment opportunities are addressed elsewhere in this appraisal.

Alternative Options - On-Site Transport Issues at Cranbrook

6.37 The following alternative options have been identified in respect of addressing on site transport considerations at Cranbrook and promotion of sustainable transport (see the first table at the end of this sub-section for appraisal of options against SA objectives):

a) Promotion sustainable transport modes in Cranbrook – specifically based on a hierarchy in the order of – walking, cycling, public transport and private transport.

b) Not specifically promoting sustainable transport and not recognising a hierarchy of modes.

[15] See documents at: http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/cranbrook-plan-preferred-approach-evidence-base/#article-content

Direct impacts - On-Site Transport Issues at Cranbrook

6.38 There are a range of positive sustainability benefits associated with option a) including in respect community services (SA Objective 2), Health (4), Leisure (7), Amenity (10) and reducing greenhouse gas emissions (14). Of greatest significance is, however, the significant positive in respect of the SA objective of promoting sustainable transport. There are no negative sustainability issues associated with this option.

6.39 In contrast to the positives associated with promoting sustainable transport the non-promotion of sustainable transport (including with an expectation of a reliance on the private car) scores negatives against the range of sustainability objectives that sustainable transport proposals score positively against. In respect of Employment (SA objective 18) and inward investment (20) uncertain responses are recorded. The ability to access shops by car might be a factor that could encourage more people to visit the town centre and this could have positive benefits, however and conversely, if Cranbrook is designed around easy movement of car driving then people might be tempted to drive out of Cranbrook visit shops and commercial facilities with potential for adverse impacts.

Secondary, cumulative and synergistic impacts - On-Site Transport Issues at Cranbrook

6.40 Whilst no explicit secondary, cumulative and synergistic impacts are identified the means of transport used could be expected to have possible wider impacts.

Permanence and Timescale of impacts - On-Site Transport Issues at Cranbrook

6.41 The importance attached to travel, specifically an approach based on promoting sustainable modes of transport, will impact on fundamental design aspects of Cranbrook. There can be expectation of some permanence of decisions though this will also, over time, depend on the sustainable modes remaining a realistic and desirable choice for movement.

Scope for Mitigation - On-Site Transport Issues at Cranbrook

6.42 As there are no clear negatives associated through the SA objectives in respect of promoting sustainable travel there is no explicit mitigation identified. However, it is recognised that ensuring that sustainable travel modes are attractive and well used could have cost implications.

Alternative Options - Off-site away from Cranbrook

6.43 The following alternative options have been identified in respect of addressing off-site transport considerations at Cranbrook (see the second table at the end of this sub-section for appraisal of options against SA objectives):

a) **Off-site at Cranbrook** – Reduce car journey numbers and congestion and delays in to Exeter City Centre and encourage non-car travel modes.

b) **Off-site at Cranbrook** – Do nothing to reduce off site impacts and do not promote non-car modes of transport.

Direct impacts - Off-site away from Cranbrook

6.44 There are a wide range of positive sustainability benefits associated with seeking to reduce congestion and car reliance for travel into Exeter. Positives are identified in respect of community services (SA Objective 2), Education (3), Health (4), and reducing greenhouse gas emissions (14). Education is noted as provision of post-secondary education would be off-site from Cranbrook with many students potentially studying in Exeter. Of greatest significance is, however, the significant positive in respect of the SA objective of promoting sustainable transport. There are no negative sustainability issues associated with this option.

6.45 In contrast to the positives associated with seeking to reduce congestion and car reliance for travel into Exeter the do-nothing option scores corresponding negatives against the sustainability objectives. In respect of Employment (SA objective 18) and inward investment (20) uncertain scores are recorded as it is not known if or how actual road systems could cope with the extra demand.

Secondary, cumulative and synergistic impacts - Off-site away from Cranbrook

6.46 Whilst no explicit secondary, cumulative and synergistic impacts are identified the means of transport used could be expected to have possible wider impacts.

Permanence and Timescale of impacts - Off-site away from Cranbrook

6.47 Given congestion issues, at peak times, traveling into Exeter there is a permanence to sustainability considerations.

Scope for Mitigation - Off-site away from Cranbrook

6.48 As there are no clear negatives associated through the SA objectives in respect of congestion reduction /car reliance and for travel into Exeter there is no explicit mitigation identified. However, it is recognised that there may be cost considerations associated with measures for implementing this approach (and cost implications if not implemented).

Table 6.5a - SA appraisal of alternative options for On-site - the role and importance of promoting sustainable transport modes

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a) Promotion sustainable transport modes in Cranbrook – specifically based on a hierarchy in the order of – walking, cycling, public transport and private transport.	0	+	0	+	0	0	+	0	0	+	0	++	0	+	0	0	0	0	0	0
b) Not specifically promoting sustainable transport and not recognising a hierarchy of modes.	0	-	0	-	0	?	-	0	?	?	0	--	0	-	0	0	0	?	0	?

Table 6.5b - SA appraisal of alternative options for Off-Site - links to surrounding areas

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a) Reduce car journey numbers and congestion and delays in to Exeter City Centre and encourage non-car travel modes.	0	+	+	+	0	0	0	0	0	0	0	++	0	+	0	0	0	0	0	0
b) Do nothing to reduce off site impacts and do not promote non-car modes of transport.	0	-	-	-	0	?	0	0	?	?	0	--	0	-	0	0	0	?	0	?

Landscape and Visual Impact

6.49 Cranbrook is being built on a greenfield site and sits in an attractive landscape setting. The area of Cranbrook that has an existing planning permission, and also the Local Plan allocated land, is reasonably flat though on the easterly edge the ground rises quite sharply to form a visual separation from the village of Whimple. Rockbeare village lies to the south of Cranbrook and it sits at a lower level. The different height levels of Cranbrook (as built and committed at present) and Rockbeare village is such that although the two settlements are close, around 300 metres at the nearest point, there remains a definite visually separation.

Alternative Options

6.50 The following possible policy approaches are identified in respect of landscape and future development impacts (see table at the end of this sub-section for appraisal of options against SA objectives):

a) Accommodate future development in locations that are not prominent in the landscape specifically not from the villages of Rockbeare and Whimple (the two villages closest to Cranbrook); or

b) Accept that development can or should occur in visually prominent locations, specifically including in respect to visual prominence to nearby villages.

6.51 No reasonable alternatives options are identified.

Direct impacts

6.52 For most of the SA objectives the location of development, in terms of landscape considerations, has no direct bearing. Where there is relevance is in respect of SA objectives 8 – historic environment (noting historic buildings at Rockbeare and Whimple) and 10 Amenity; though most of all in respect of SA Objective 9 that deals with landscape concerns.

Secondary, cumulative and synergistic impacts relating to airport noise

6.53 There are no specific secondary, cumulative and synergistic impacts noted.

Permanence and Timescale of impacts

6.54 Any development in visually prominent locations can be expected to have immediate short term adverse impacts, though to some degree this may ‘soften’ over time, especially if new planting, specifically trees, starts to form a screen to development. However substantial tree planting might be alien and negative in its own right in what is in parts of the Cranbrook area a quite open landscape.

Scope for Mitigation

6.55 The negative impacts that can arise from development can to some degree benefit from mitigation measures, albeit and as noted above mitigation (such as heavy tree planting) can be alien in character to some open countryside locations.

Table 6.6 - SA appraisal of alternative options for considering landscape considerations

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a) Accommodate future development in locations that are not prominent in the landscape specifically not from the villages of Rockbeare and Whimple (the two villages closest to Cranbrook)	0	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0
b) Accept that development can or should occur in visually prominent locations, specifically including in respect to nearby villages	0	0	0	0	0	0	0	-	- -	-	0	0	0	0	0	0	0	0	0	0

Open Space Sports Pitch Provision

6.56 Sports pitches and associated facilities can take up large areas of land and be expensive to maintain. However, participation in sporting activities promote health and wellbeing as well as being enjoyable in its own right.

Alternative Options

6.57 Two approaches to the distribution of sports pitches were identified in the Issues and Options report and are regarded as the reasonable alternatives to look at again in more detail (see table at the end of this sub-section for appraisal of options against SA objectives):

a) Provide sports pitches over a number of sites comprising only one or two pitches on each and located throughout the town so that they are easily accessible to everyone, although they would only be able to provide limited facilities.

b) Provide large sports hubs in two (or perhaps more) locations which would have the potential to provide more and better pitches and also to provide club houses, changing facilities, social venues that would support sports clubs and enable other social events to take place.

6.58 It should be noted that the only other alternative identified was to not provide sports facilities (or perhaps rely on facilities in other locations, such as other East Devon towns or in Exeter). The alternatives were, however, rejected on account of not being reasonable.

Direct impacts

6.59 There are positive comparative SA benefits associated with both approaches, although differences are not great. **Option a)** is likely to have positive effects on the accessibility of sports facilities for the community (SA objective 2) and on levels of walking and cycling (SA objective 12) because more people would live within a short distance of a sports facility. Positive effects on health (SA objective 4) are also likely. However, each individual facility may be less high quality and the lack of associated facilities may deter some people from using them, which could have the opposite effect. The effects of **option b)** would tend to be the opposite – while facilities may be less accessible, they could be more comprehensive which may encourage people to make more use of them.

6.60 In respect of direct impacts there could be a case that the sustainability effects would be most positive (but perhaps only marginally so) if a mix of sports facilities can be provided – some smaller and more dispersed and some larger and more comprehensive. This, however, would need to be set against other considerations, notably the costs of sports pitch provision and whist this is not a factor taken directly into account in the sustainability appraisal it is noted that economies of scale would be likely to make provision of a small number of big facilities a commercially more viable proposition than many smaller facilities.

Secondary, cumulative and synergistic impacts

6.61 There are limited secondary impacts noted for either option though for both the community related benefits associated with sports activity, as an example, could see positive outcomes in terms of lessening appeal of crime and therefore criminal activity (Objective 5).

6.62 Under both options for sports pitch provision there is probably more likelihood of cumulative and synergistic relationships. For example the more people participate in sports the more use could be expected of social and community facilities (though cumulative impacts could have some negatives if there was insufficient capacity in facilities but with a growing desire to use them).

Permanence and Timescale of impacts

6.63 The expectation would be that facilities would be of a permanent nature and whilst it may take a while to secure delivery, and potentially a while for clubs to be formed or casual use to emerge to use facilities, the expectation would be that the largely positive impacts identified would be permanent in nature.

Scope for Mitigation

6.64 The possible negatives associated with sports pitch provision, and they are likely to be marginal negatives, are associated with, SA objective 6 – Noise, 9 – Landscape Character and 11 – Biodiversity. Sports pitches can be moderately noisy though careful planning at the outset should allow for a separation of pitches and any associated facilities away from immediate residential neighbours and so noise concerns can be managed. Sports pitches can, at their most intrusive, require large areas of land remodelling and if done badly this can have adverse landscape impacts. Again early and careful planning and site selection offers scope to mitigate potential for adverse impacts, though this may be more challenging with the option for larger scales developments rather than an approach of greater pitch dispersal. Adverse biodiversity impacts may also arise given that sports pitches are typically heavily manicured spaces of limited biodiversity value, but they can offer scope for planting at their edges.

Table 6.7 - SA appraisal of alternative options for sports pitch provision

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a) Provide sports pitches over a number of sites comprising only one or two pitches on each and located throughout the town	0	+	0	+	0	-	++	0	-	0	-	+	0	0	0	0	0	0	0	0
b) Provide large sports hubs in two (or perhaps more) locations which would have the potential to provide more and better pitches and also to provide	0	++	+	+	0	-	++	0	-	0	-	0	0	0	0	0	0	0	0	0

Suitable Alternative Natural Greenspace

6.65 Suitable Alternative Natural Green Space (SANGs) are areas that will be attractive recreation areas for residents, notably dog walkers and other uses/users that can have adverse impacts, to use instead of visiting the most significant wildlife sites - Special Protection Areas (SPA). The Council have an agreed mitigation strategy to provide SANGS in the vicinity of Cranbrook and the Cranbrook Plan identifies a number of land areas that could contribute to fulfilling this role.

Alternative Options

6.66 The following possible policy approaches are identified in respect of SANGS (see table at the end of this sub-section for appraisal of options against SA objectives):

a) Provide SANGs in and immediately next to Cranbrook.
b) Provide SANGs in the general vicinity of Cranbrook but not necessarily an easy walking distance.

6.67 The Masterplan takes the approach outlined in Option a) whereas the alternative option b) would see SANGs provision on land that could be some distance form Cranbrook and might, for example, require a car drive to access it. No other reasonable alternatives options are identified.

Direct impacts

6.68 SANGs provision at or close to Cranbrook, Option a), scores significant positive benefits in respect of two SA objectives, 4 – Health and 7 – Leisure and Recreation. SANGs will provide spaces for people and dogs to get out and exercise in open areas. However SANGs close to the airport could suffer from adverse noise pollution (albeit watching airport activity could be attractive to some people). Uncertainty also applies to SA Objective 11 as whilst being SANGs could provide some scope for land to be subject to biodiversity improvements it will also be land that has a greater intensity of human and dog activity which could have adverse impacts.

6.69 For option b) there is potentially an element of a an unknown as it is not specified where they may be, but on assumption that they could be some distance from Cranbrook and for this reason and hence less well used, two SA objectives, 4 – Health and 7 – Leisure and Recreation are (only) given positive impact scores. The potential for some or a greater degree of car use to access these sites generates negative scores against SA Objectives for Sustainable Transport (12) and greenhouse gas emissions (14).

Secondary, cumulative and synergistic impacts relating to airport noise

6.70 SANGS provision, whether at Cranbrook or further away, could be expected to have wider ‘knock-on’ positive sustainability impacts, though more so where the SANGs are most widely used and accessible.

Permanence and Timescale of impacts

6.71 SANGs should be seen as permanent in nature and the aspiration would be for early deliver to encourage and support an early pattern of use by residents of Cranbrook; rather

than an absence of designated spaces causing patterns of travel to further away places, notably designated wildlife sites, for recreation activity.

Scope for Mitigation

6.72 Possible uncertainties (and potential for negatives) in respect of SANGs provision close to Cranbrook could include looking at alternatives to provision close to the airport where noise issues might arise, or ensuring that a variety of other (quiet) areas are also provided. In respect of possible adverse biodiversity impacts measures to protect and enhance habitats and features and manage recreational uses could be desirable and appropriate.

Table 6.8 - SA appraisal of SANGS

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a) Provide SANGs in and immediately next to Cranbrook.	0	0	0	++	0	?	++	0	0	0	?	0	0	0	0	0	0	0	0	0
b) Provide SANGs in the general vicinity of Cranbrook but not necessarily an easy walking distance.	0	0	0	+	0	0	+	0	0	0	?	-	0	-	0	0	0	0	0	0

Sustainable Drainage Systems

6.73 Sustainable Drainage Systems (SuDS) are natural parts of the landscape that have the ability to store surface water such as ponds, swales and filter strips. SuDS are typically used as an alternative to more conventional ways of managing floodwater such as rapidly piping it away.

Alternative Options

6.74 The following possible policy approaches are identified in respect of use of SuDS (see table at the end of this sub-section for appraisal of options against SA objectives):

a) Incorporate SuDS into Cranbrook.
b) To not use SuDS and rely on conventional hard engineering solutions.

6.75 No other reasonable alternatives options are identified.

Direct impacts

6.76 The use of SuDS, option a), scores positively against a range of Sustainability Objectives, specifically Landscape (9), Biodiversity (11), Air, soil and water (13) and flood risk (15). As a technical response to flooding concerns, option b), also scores positively against the flood risk objective.

6.77 SuDS schemes can be quite land intensive and if or where not used they could potentially offer scope for land to be used for other purposes including more development. On this basis some of the land using uses under Option b) could potentially score a positive, though in the table such potential is not identified and negligible impacts are recorded.

Secondary, cumulative and synergistic impacts relating to drainage

6.78 There are no specific Secondary, cumulative and synergistic impacts identified.

Permanence and Timescale of impacts

6.79 Once developed any SuDS provision can and should be regarded as permanent in nature and positive benefits can be expected to occur when implemented (or even exist before).

Scope for Mitigation

6.80 Whilst there are costs associated with establishing and maintaining SuDS there are no specific mitigation considerations identified that are directly relevant to their provision.

Table 6.9 - SA appraisal of SuDS

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a) Incorporate SuDS into Cranbrook	0	0	0	0	0	0	0	0	+	0	+	0	+	0	+	0	0	0	0	0
b) To not use SuDS and rely on conventional hard engineering solutions	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0

Overhead Power Lines

6.81 The eastern expansion area and land to the south of it have two overhead power lines that cut across the site. Both lines are held on steel lattice towers which are quite visually prominent and the land beneath and 15 metres either side of them cannot be developed whilst they remain in place. The Cranbrook Plan proposes partial undergrounding of one of the lines. This frees up over 3 hectares of land for development that would not otherwise be available and should result in a better and more compact form of development and reduce pressure for development in landscape sensitive areas.

Alternative Options

6.82 The following possible policy approaches are identified in respect of SANGS (see table at the end of this sub-section for appraisal of options against SA objectives):

a) To partially underground one of the cables.
b) To not underground the cable.

6.83 No other reasonable alternatives options are identified.

Direct impacts

6.84 The undergrounding of the length of cable is identified as having positive impacts against the following SA Objectives – Housing (1), Landscape character (9) and amenity (10). To not do so scores negative impacts.

Secondary, cumulative and synergistic impacts relating to undergrounding overhead power lines

6.85 There are no secondary, cumulative and synergistic impacts identified.

Permanence and Timescale of impacts

6.86 The impacts identified are seen as permanent in nature. Retrospective undergrounding of cables, after development occurs, is seen as an improbable outcome.

Scope for Mitigation

6.87 The negative impacts associated with not undergrounding the cable would present some challenges to address though through careful design some mitigation of adverse impacts could occur.

Table 6.10 - SA appraisal of Overhead power Lines

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a) To partially underground one of the cables.	+	0	0	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0
b) To not underground the cable.	-	0	0	0	0	0	0	0	-	-	0	0	0	0	0	0	0	0	0	0

Gypsy and travellers

6.88 Gypsies and Travellers are defined as *"persons of nomadic habit of life, whatever their race or origin".* There is a history of gypsies and travellers using the London Road as a route through the general area and stopping in the area and nearby locations now occupied by Cranbrook. There have also been temporary encampments in the town in recent years. This highlights the need for provision in the area which is also established by the Devon Partnership Gypsy and Traveller Accommodation Assessment (GTAA)[16] 2014. In response to this assessment the Local Plan identifies Cranbrook as a location for up to 30 pitches and a gypsy and traveller site design guide has also been produced and adopted as a supplementary planning document (SPD).

6.89 The most recent assessment of gypsy and traveller needs across the whole of East Devon shows there is a need for 16 pitches in the shorter term, up to 2019, and 12 in the longer term, after this date. This gives a total current need of 28. In a local context gypsy sites can vary in scale from one or two pitches (typically a family will occupy a pitch with one or two caravans and other vehicles) up to 15 or so pitches.

6.90 The masterplan identifies two sites for the provision of gypsy and traveller pitches. These are to be located on the edges of the town where access to services and facilities as well as the wider road network are available. It is anticipated that the sites will accommodate a mixture of permanent and transit pitches but that the total number of pitches will be less than that envisaged by the Local Plan.

Alternative Options

6.91 In terms of the location gypsy sites at Cranbrook there are a range of possible options as identified below (see table at the end of this sub-section for appraisal of options against SA objectives):

a) A single large site;

b) A small number (say two) medium sized sites;

c) A large number of very small sites.

d) Off-site provision

6.92 In the context of the above, and at this stage, assessment has not extended to quantify the actual number of pitches, in total, that should be provided for a Cranbrook. At the Preferred Approach stage of plan making options a) to c) were assessed and EDNCp made comment that off-site provision should also be tested. As a further option, at this publication stage of work, option d) of off-site provision is also tested.

Direct impacts

6.93 The provision of pitches in any location in or at Cranbrook, which this paragraph of text is specifically concerned with) would have positive effects on housing (SA objective 1),

[16] See: http://eastdevon.gov.uk/media/1298707/devon-partnership-2015-gtaa-final-report.pdf

especially if enough are developed to meet the identified need of gypsies and travellers. The location of the sites within Cranbrook will influence the effects on many of the SA objectives as this will determine how accessible sites are to schools, community facilities, jobs and sustainable transport links. Effects on many of the SA objectives will be more positive where pitches are well-connected and levels of car use can be lower. Larger sites may be more visible and therefore more likely to affect landscape character (SA objective 9) and the setting of heritage assets (SA objective 8); however fewer sites may be provided overall if they are larger in size which could reduce the likelihood of impacts on those SA objectives. Conversely, smaller sites may be less visible but there would be more sites overall; therefore increasing the likelihood of heritage assets and the landscape being affected, although these impacts could be mitigated through good design of sites. There can be concerns (real or perceived) of crime (SA objective 5) associated with gypsy site provision and it is possible that on a larger site the concerns might be disproportionately greater

6.94 With respect to option d) off site provision there is a fundamental difficulty as it is not know where such a site may be located and no specific site was identified or promoted in the representation that called for appraisal. Given the uncertainty of potential site location it is difficult to other than identify a series of uncertain (?) responses in respect of impacts when measured against many of the SA objectives. More importantly, however, (especially in practical terms), is the concern that it may not actually be possible to identify and deliver an off-site option. To complement provision at Cranbrook the Council has undertaken extensive work seeking to identify gypsy site options across all of East Devon and has not, to date, identified appropriate land.

Secondary, cumulative and synergistic impacts

6.95 There are no significant secondary, cumulative or synergistic impacts noted.

Permanence and Timescale of impacts

6.96 Effects could occur in the short to medium term as once the sites are provided there would be minimal construction time needed.

Scope for Mitigation

6.97 Potential for adverse impacts, specifically on a larger site, is most readily related to potential for landscape impacts. Mitigation through well thought out site design should overcome adverse impacts. This consideration does apply to smaller sites to some degree as well.

Table 6.11 - SA appraisal of alternative options for gypsy and traveller site provision at Cranbrook

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a) A single large site;	++	0	+	+	-	-	0	0	-	0	0	0	0	0	0	0	0	0	0	0
b) A small number (say two) medium sized sites;	++	0	+	+	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0
c) A large number of very small sites.	++	0	+	+	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0
d) Off site provision	++ ?	?	?	?	0	?	?	?	?	?	?	?	?	?	?	0	0	0	0	0

Noise

6.98 Airport noise, and the potential for adverse health impacts that noise can have, is seen as a factor of critical importance for the future development of Cranbrook. Furthermore, beyond being an actual health issue and a causal poor health determining factor, noise can also be a nuisance and disagreeable. The Civil Aviation Authority issued a report in 2016 - Aircraft noise and health effects: Recent findings - CAP 1278[17] that highlighted health impacts from aircraft noise and East Devon District Council commissioned the advice from Bickerdike Allen on noise emissions from Exeter airport. This report was specifically commissioned to inform determination of the planning application submitted by EDNCp but it does have explicit relevance to Cranbrook Plan policy in respect of noise issues and particularly for the allocation of land for development.

6.99 The Issues and Options report, at various points and notably including paragraphs 5.a.25-28, highlighted the relevance of noise considerations. In response to comments received on noise matters on the SA of the Issues and Options report the matter of noise is readdressed in more detail in this assessment. The most critical issue in respect of noise is whether development, especially new housing, should be allowed close to Exeter airport noting noise levels generated by and from the airport.

Alternative Options

6.100 The following possible approaches in respect of airport noise considerations were assessed (see table at the end of this sub-section for appraisal of options against SA objectives):

a) Build in areas that are compliant with standards promoted by EDNCp as they advise are set out in the Noise Policy Statement for England;

b) Build up to but not beyond areas that are compliant with World Health Organisation noise limits – 55 dB;

c) Build in areas that are less noisy than the above.

6.101 It was not considered that there were any reasonable alternatives to the above.

6.102 In simple terms **option a)** above would allow for development, specifically new houses, closest to the airport (up to/close to the operational boundary of the airport) and in areas that receive the greatest noise levels. This is the option being promoted by the EDNCp and would see, according to their planning application submitted for the south west expansion of Cranbrook, new housing being built (at the closest point) around 500 metres from the main airport runway. This option would result in houses being built in areas that exceed a 55 dB noise level.

6.103 **Option b)** would draw housing development away, to the north of the airport, and at its closest around 750 metres from the runway and beyond a 55 dB line.

6.104 A more rigorous (less noisy) standard, **option c)** would see new housing even further away, to the north, of the airport. For this SA work a possible decibel boundary is not

[17] https://publicapps.caa.co.uk/docs/33/CAP%201278%20MAR16.pdf

defined but if this restrictive approach were applied it could, for example, place significant if not total limits on westerly Cranbrook development to the south of London Road.

6.105 As set out earlier in this report (See Chapter 4) the SA work is premised on assessment that development (specifically including housing development) in areas that exceed World Health Organisation 55 dB levels is inappropriate. This perspective directly informs commentary and assessment reported below.

Direct impacts relating to airport noise

6.106 Taking the noise issues in isolation each alternative option appraised records the same conclusions for most SA objectives; most of the SA objectives are not explicitly influenced by noise. However, **Option a)** for SA objectives 1, 3, 4 and 6 (all of which in SEA regulation terms relate to population and health) record the greatest negative impacts. For these four SA objectives the double negative - - of *"The option or policy is likely to have a significant negative effect on the SA objective(s)"* are recorded. This conclusion is based on the wider council evidence and interpretation relating to noise impacts. In respect of SA objective 3 the concern would be specifically relevant should any outdoor school spaces (e.g. playgrounds or outdoor classrooms) be in the noisy areas.

6.107 **Option b)** scores lower than a) but still has single negative impacts *"The option or policy is likely to have a negative effect on the SA objective(s)"* for SA objectives 1, 3, 4 and 6. These impacts are, however, seen to be more related to nuisance considerations (the noise is somewhat disagreeable) rather than actual adverse health impacts.

6.108 **Option c)**, by avoiding the nosiest areas clearly has the least potential identified adverse impacts.

Secondary, cumulative and synergistic impacts relating to airport noise

6.109 In respect of the issue of aircraft noise the direct impacts noted are of most significance, especially if development occurs in the nosiest of locations, there could however be expected to potentially be some secondary adverse impacts. For example if there are sectors of the community that suffer from noise related health problems (direct impacts on SA Objective 4) this could impact on their ability to work effectively and therefore contribute to employment objectives (for example SA Objective 18).

6.110 Probably of more relevance than secondary impacts are the possible cumulative impacts that could arise such as from people living in noisy environments, potentially under-utilising some outdoor spaces, because they are in locations that are noisy and would not offer peace and quiet for contemplative forms of recreation. Such combinations as this could cumulatively be of increasing significance.

Permanence and timescale of impacts

6.111 Noise impacts can be expected to be permanent in nature, assuming the airport continues to exist and operate. Whilst some less noisy planes may operate in the future the airport could accommodate more noisy ones as well and in general might be expected to carry more traffic in the future. Applying a precautionary approach suggests that is prudent to see airport noise issues as a permanent concern.

Scope for mitigation

6.112 There are measures that can be taken, to some degree, for mitigating against noise impacts for example there have been suggestions for a noise pen to be built around the site used for aircraft engine testing. Such provision, if built, could significantly reduce areas that are subject to noise pollution and reduce the scale of that pollution; though noise pollution levels elsewhere could increase (the pen may 'bounce' noise into other areas).

6.113 There are also mitigation measures that can be implement through careful choice of precise building locations, building orientation, careful location of outdoors spaces and gardens. Noise insulation can be used and such measures as putting less sensitive development (such as employment buildings) closer to the airport and potentially using these as noise barriers to 'protect' other areas. Whilst all of these measures might offer some help and benefits there is a lack of evidence to show that they could have significant beneficial impacts (perhaps at best they could extend, to some degree, the total area of land that could be suitable for development).

Table 6.12 - SA appraisal of alternative options for considering airport noise

SA Objectives are on the top row – headline subject matters only are shown – objectives should be read in full for a complete picture (see chapter 2 of this SA)	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
a) Build in areas that are compliant with standards promoted by EDNCp as they advise are set out in the Noise Policy Statement for England;	- -	0	- -	- -	0	- -	-	0	0	0	0	0	0	0	0	0	0	0	0	0
b) Build up to but not beyond areas that are compliant with World Health Organisation noise 'limits' – 55 dB;	-	0	-	-	0	-	-	0	0	0	0	0	0	0	0	0	0	0	0	0
c) Build in areas that are less noisy than the above.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Airport Safeguarding

6.114 The final section of chapter 2 of the Masterplan is in respect of noise and advises:

> *"Tall buildings can have an impact on the airports navigation systems distorting radar signals. Advice from the airport operators tells us that these systems while currently effective were not designed to take account of the levels of development now proposed around the airport……. The masterplan proposes development within the area that affects the aircraft navigation systems, however developers will be required to contribute to the cost of a new system and further assessment work before any development over two storey's is allowed."*

6.115 It is not considered that there are alternatives to not secure a new navigation system and absence of alternatives has meant that SA testing around this issues has not been undertaken.

Spatial and other conclusions from testing underlying principles

6.116 This stage of appraisal has identified a number of favoured options and approaches to the spatial distribution of further development at Cranbrook. Key locational matters, noting assessment in this chapter of the SA and the Savills overall masterplanning work, has helped build up a spatial pattern for development.

6.117 In building up a spatial picture of future Cranbrook development it is important to note that a large part of Cranbrook has already been built and planning permission exists to extend Cranbrook in an easterly direction. In addition there is land allocated in the Local plan for the further eastward and westward expansion of Cranbrook. Whilst scope exist through the Cranbrook Plan to determine what should go where within these allocations (and to a minor degree potentially tweak boundaries) these areas are taken as a starting point for considering further outward expansion of Cranbrook.

6.118 Airport noise, landscape considerations and floodplains have been identified as critical considerations in determining the extent of land that might have scope for accommodating further development. Areas with landscape and airport noise considerations that are seen as at or close to being absolute constraint on development. The option of building on the floodplain has not been tested through this SA work as it is taken as an absolute constraint in its own right.

6.119 In terms of building north of the Exeter Waterloo railway line, specifically for anything that is of a strategic or large scale, this is seen as a theoretically possible option but has not been considered in detail in this SA work on account of:

a) There are significant floodplain constraints (especially on the western side);

b) There are large tracts of land that are in National Trust ownership and which has an inalienable status;

c) Any new vehicular crossing of the railway, which strategic or large scale development would require, would be extremely expensive (if not prohibitively so).

d) Land of a strategic scale has not been promoted for development by landowners or other (though one smaller scale area at Lodge Trading Estate on the road to Broadclyst Village has been promoted for development and is assessed in the next chapter of this report).

6.120 Taking these containing factors into account and working on the basis that it is not appropriate to revisit and undertake additional SA work on:

- the already built parts of Cranbrook;
- Land that has planning permission for development;
- Land that is allocated in the local plan (though see detailed commentary in the next chapter of this SA report on site specifics);

6.121 It leaves two larger scale potential areas of search for future Cranbrook expansion, one to the south east and one to the south west.

South Westerly Expansion Option

6.122 This SA work informs the potential suitability for strategic development in a south westerly direction at Cranbrook. There are, however, limits to how far southwards or westward development should be accommodated, as defined by airport noise and landscape considerations. It should be noted that Cranbrook land allocations lie to the north of this area and Skypark is to the west.

South East Expansion Option

6.123 To the south east of Cranbrook, south of London Road, the constraints to development are less pronounced. There is not the aircraft noise to contend with and land is flatter in profile, specifically other than where it is closer to the village of Rockbeare and there is visual connectivity between the village and potential development land. Whilst there are, measured against noise and landscape consideration, fewer constraints on development in this south east search area it is the case that the further south and east any development were to go the further away and hence more remotely located it would be from the core facilities, including the town centre, of Cranbrook.

6.124 The next two chapters expand on the above assessment work and consider in more detail:

a) Masterplan design principles; and

b) Actual specific development site options.

7 SA Testing of the 2019 Masterplan Design Principles

7.1 This chapter of the SA considers design principle, as set out in chapter 3 of the Cranbrook Masterplan, originally as set out on the 2017 draft and now in the 2019 draft. The Cranbrook Plan establishes seven principle that have been informed by the key evidence (see preceding chapter of this appraisal and chapter 2 of the actual Cranbrook Plan). The design principles are similar in nature to plan objectives, though as it is a Masterplan that they inform they are very much orientated towards and around the spatial location of development rather than the broader range of considerations that may feature in a more comprehensive planning policy document.

7.2 Under each design principle there are a series of bullet points that set out how the principle has been translated into spatially relevant considerations, or to put it more simply what, in broad terms, goes where on the Masterplan.

7.3 The bullet point considerations are compared against the SA objectives in the table below along with a supporting commentary. At this stage of appraisal work the design principles have not be compared against alternative options; in broad terms, given the evidence behind the Masterplan (and noting that alternatives have already been tested against these in the SA) it is not seen that significant realistic alternatives exist. However some qualifying commentary in respect of possible alternatives, to help with context setting, is provided.

7.4 It should be noted that there were a number of mostly small changes to some of the bullet pointed headings under the design principle form the 2017 draft of the masterplan to the 2019 draft. The principles themselves have not however changed. The changes are incorporated into this assessment of the 2019 draft.

Principle 1: Compact urban form

7.5 Broadly speaking the principle of securing a compact urban form can be seen to have mostly negligible but some positive sustainability impacts where assessed against the sustainability objectives. Objectives relating to provision and accessibility to community services (notable objectives 2 and 7) and those relating to encouraging walking and cycling and reducing greenhouse gas emissions (objectives 12 and 14) score positively, as does health (objective 4). Under the first of the bullet points there is a question mark against SA landscape character (objective 9) as there is some uncertainty identified in respect of potential adverse impacts. Compact forms of development, if implemented badly, could result in tree and vegetation loss, possible other adverse impacts and 'cramming' development into limited spaces.

7.6 Whilst these adverse impacts are clearly not bound to occur it does point to the need for careful and sensitive planning to ensure that appropriate design and schemes come forward and that scope for mitigation, where adverse impacts might otherwise arise, is planned in at an early stage. In respect of noise issues it is noted that reference is made to a dedicated engine testing pen at the airport, this is seen as being positive, however there may be an outstanding concern in respect of development to locations close to busy roads and potential for adverse noise impacts. If development types such as housing or schools are located close to roads they could introduce people to adverse noise impacts, hence the uncertainty against SA objective 6. Care over the siting of development will be appropriate for noise sensitive uses.

7.7 Whilst formal testing of a non-compact urban form (i.e. more dispersed development) has not been undertaken it could offer potential comparative positive benefits around SA Objective 10, Amenity, by providing bigger homes and gardens for people to live in and biodiversity benefits by creating more space for nature in gardens (Objective 11). In contrast, however, negatives could be expected against sustainable transport and greenhouse gas objectives as people could be expected to be more car reliant (Objectives 12 and 14) and negative amenity impacts may arise, objective 10, as people may find it more difficult to access facilities.

Table 7.1 - Objectives relating to - Principle 1: Compact urban form

SA Objectives are on the top row – bullet points that come under the Principle in the masterplan are listed below	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
• The masterplan shall establish a compact urban form where all residential neighbourhoods are within walking distance of attractive open spaces, community spaces and amenities.	0	++	0	+	0	0	+	0	?	0	0	++	0	+	0	0	0	0	0	0
• The masterplan shall maximise coherent developable land within each expansion area through measures including: • the use of a connected grid arrangement; • the introduction of a dedicated engine testing pen at Exeter Airport to mitigate engine ground running noise; and • the undergrounding of the 132kV power line which would otherwise cause serious a fragmentation of the development parcel; risk spreading development into landscape sensitive areas; and would undermine the deliverability of the plan	0	+	0	0	0	?	0	0	0	0	0	+	0	+	0	0	0	0	0	0

Principle 2: Higher density housing and amenities close to the key movement corridors

7.8 The bullet points under Principle 2, for the most part, are identified as generating either positive or negligible impacts against the Sustainability Objectives. Land is allocated for the eastward and westward expansion of Cranbrook in the Local Plan and so in principle decisions about future growth in these general directions is already determined by policy. By locating neighbourhood centres to both the east and west of Cranbrook (as it currently exist) will ensure that most residents of the town should have good or reasonable access, specifically pedestrian access, to the facilities that neighbourhood centres will offer.

7.9 By having higher density housing development closer to the centres it should reinforce the positive benefits of more people being in closer proximity to the centres. Significant positive benefits are identified against SA objectives 18 and 20 in respect of promoting employment growth and having provision at neighbourhood centres. Where question marks are identified in respect of uncertain impacts they highlight the possibility for adverse impacts depending on design and implemented schemes. Adverse noise impacts, Objective 6, could arise if neighbourhood centres generate a lot of activity that is too close to noise sensitive uses and similar potential for adverse impacts could apply in respect of SA objective 9, 10 and 11 – landscape, amenity and biodiversity.

7.10 In respect of the final bullet point with the average densities at a medium level overall and higher close to neighbourhood centres there could be adverse impacts from the mass and scale of development unless carefully planned for, for example in respect of noise (SA objective 7) and amenity (SA objective 10).

Table 7.2 - Objectives relating to - Principle 2: Higher density housing and amenities close to the key movement corridors

SA Objectives are on the top row – bullet points that come under the Principle in the masterplan are listed below	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
• The masterplan shall locate neighbourhood centres to the east and west of Cranbrook on the main London Road.	0	+	0	+	0	0	+	0	0	0	0	+	0	+	0	0	0	0	+	+
• Higher density, active frontages and integrated pedestrian crossings shall be used to change the character of the London Road to an active space forming a legible gateway to the town	0	+	0	0	0	0	0	0	0	0	0	+	0	+	0	0	0	0	+	+
• Mixed-use employment and un-prescribed uses including shared community uses shall be centred around neighbourhood centres.	0	+	0	0	0	?	0	0	0	?	0	+	0	+	0	0	0	++	+	++
• Housing typologies shall be introduced to help define character areas and focus a proportionally higher number of properties around neighbourhood centres and mixed use areas.	+	+	0	0	0	?	0	0	0	?	0	+	0	+	0	0	0	++	+	++

Principle 3: Strong links between Cranbrook, Cranbrook station and employment areas

7.11 Principle 3 relates to links between Cranbrook and close by strategic employment areas. The bullet points score highly when measured against employment and economic growth objectives, notably SA objective 18. Against other SA objectives impacts are identified as negligible though uncertain question marks appear against objective 10 relating to amenity. Employment uses, at their most intrusive, can cause some disruption to other neighbouring uses, though 'bad-neighbour' employment activities are far less prevalent than might have been the case in years gone by and also with careful planning and development spaces can be developed to avoid adverse impacts.

Table 7.3 - Objectives relating to - Principle 3: Strong links between Cranbrook, Cranbrook station and employment areas

SA Objectives are on the top row – bullet points that come under the Principle in the masterplan are listed below	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
• The masterplan shall locate employment between mixed-use areas and the Skypark to provide 'stepping stone' space for B class employment, community studios and workshops.	0	0	0	0	0	0	0	0	0	?	0	0	0	0	0	0	0	++	+	+
• Legible safe routes for pedestrians cyclists and vehicles through Bluehayes and Treasbeare shall provide connectivity between the employment and Cranbrook Station.	0	0	0	0	0	0	0	0	0	?	0	0	0	0	0	0	0	++	+	+

Principle 4: The identity of Cranbrook shall be informed by landscape features and character

7.12 Principle 4 is explicitly concerned with how landscape consideration and constraints have informed the Cranbrook Masterplan. Significant positive effects are identified against the three bullet points in respect of SA Objective 9, Landscape Character. The third bullet point which sets out a general approach to landscape *"Established landscape features shall be retained and integrated within parks, green corridors and informal open space"* also scores positively against SA Objective 7 – leisure and recreation and 11 - biodiversity. It might also have been reasonable to show wider direct impacts on other SA objectives, such as health, SA Objective 4. Whilst these have been recorded as negligible in direct terms the implementation of the objective could be expected to have indirect positive effects in respect of the objective.

Table 7.4 - Objectives relating to - Principle 4: The identity of Cranbrook shall be informed by landscape features and character

SA Objectives are on the top row – bullet points that come under the Principle in the masterplan are listed below	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
• Cobdens and Grange shall be focused around a neighbourhood centre with higher density development radiating out to lower density areas where there is greater landscape sensitivity.	0	0	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0
• Open space shall be located over higher ground with views over Cranbrook and the wider countryside promoting legibility and identity whilst preserving the wider setting to Rockbeare and Whimple.	0	0	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0
• Established landscape features shall be retained and integrated within parks, green corridors and informal open space.	0	0	0	0	0	0	+	0	++	0	+	0	0	0	0	0	0	0	0	0

Principle 5: Attractive pedestrian and cycle routes for commuting and leisure

7.13 Principle 5 sets out objectives relating to safe and attractive pedestrian and cycle routes and encouraging these modes of travel. Measured against a range of SA objectives these bullet points score a wide range of significant positive benefits, specifically SA Objectives for Health (4), leisure and recreation (7) and Sustainable Transport (12). Positives were also recorded for most bullet points in respect of SA objectives for Community Services (2), Education (3), Greenhouse gas emissions (14) and Energy efficiency (16).

7.14 It is relevant to note that in respect of promoting attractive pedestrian and cycling routes there are no negative impacts identified against any of the sustainability objectives.

Table 7.5 - Objectives relating to - Principle 5: Attractive pedestrian and cycle routes for commuting and leisure

SA Objectives are on the top row – bullet points that come under the Principle in the masterplan are listed below	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
• The masterplan shall provide attractive and legible cycle and pedestrian routes within green corridors to key destinations and strategic cycle routes (in addition to shared routes with vehicles).	0	0	0	++	0	0	++	0	0	0	0	++	0	+	0	+	0	0	0	0
• Direct routes shall be provided for sustainable modes of transport within green corridors and public open space.	0	0	0	++	0	0	++	0	0	0	0	++	0	+	0	+	0	0	0	0
• The existing cycle path on London Road shall be extended to the eastern neighbourhood centre.	0	+	+	++	0	0	++	0	0	0	0	++	0	+	0	+	0	0	0	0
• The masterplan shall promote existing quiet lanes and proposed cycleways between Cranbrook and Rockbeare, Cranbrook and Whimple and north of the railway line for recreation in the wider countryside	0	+	+	++	0	0	++	0	0	0	0	++	0	+	0	+	0	0	0	0
• New and enhanced pedestrian footpaths between Cranbrook and Rockbeare shall be linked to the delivery of homes to the south east (Grange).	0	+	+	++	0	0	++	0	0	0	0	++	0	+	0	+	0	0	0	0
• Footpaths between Cranbrook and Whimple shall be created and enhanced subject to land owner agreement.	0	+	+	++	0	0	++	0	0	0	0	++	0	+	0	+	0	0	0	0

Principle 6: Integration with public transport

7.15 Principle 6 is in respect of integration with public transport and has one bullet point that advises that “The movement strategy (Urban Engineering Studio, August 2017) identifies a new local bus service which would connect to the rail station and a new bus service to Exeter City Centre.” This records significant positive impacts on respect of SA Objective for Sustainable Travel (12). There are, however, also positive impacts in respect of Community Services (2), Education and Skills (3) and health (4). No negative impacts are identified.

Table 7.6 - Objectives relating to - Principle 6: Integration with public transport

SA Objectives are on the top row – bullet points that come under the Principle in the masterplan are listed below	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
• The movement strategy (Urban Engineering Studio, August 2017), identifies that new bus services comprising a loop around the town and serving the expansion areas, town centre and railway station(s) could also link with a new bus interchange to connect with existing services.	0	+	+	+	0	0	0	0	0	0	0	++	0	+	0	+	0	0	0	0

Principle 7: Health provision

7.16 Principle 7 is in respect health provision with a single bullet point of "It is anticipated that health and wellbeing hubs shall be co-located with other community and cultural activities within neighbourhood centres." On assumption that this means there actually should and will be facilities in neighbourhood centres this bullet point scores a significant positive against the SA health objective (4). It scores positives against Community services (2) by providing accessible facilities close to where people will live and Greenhous Gas Emissions (14) on account of an expectation that travel journeys to visit facilities can be expected to be shorter. Over and above these positives further positive benefits are identified in respect of Employment (18) on account of jobs that will be associated with provision and vitality and viability (19) by encouraging people to visit and uses centres and facilities.

Table 7.7 - Objectives relating to - Principle 7: Health provision

SA Objectives are on the top row – bullet points that come under the Principle in the masterplan are listed below	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
• It is anticipated that health and wellbeing hubs shall be co-located with other community and cultural activities within neighbourhood centres.	0	+	0	++	0	0	0	0	0	0	0	0	0	+	0	0	0	+	+	0

Conclusion on SA Testing of Design Principles

7.17 The SA testing of design principles indicate a generally broad picture of sustainability benefits arising from their implementation. It is noted and stressed that the design principles are strongly geared around:

- urban form and density considerations;
- promoting sustainable transport; and
- landscape constraints.

7.18 The factors are clearly not the only considerations that informed the actual masterplan itself (i.e. the coloured-in plan that shows the proposed uses for differing parcels of land) but they do have an overarching influence on the shape and pattern of development proposed for Cranbrook.

8 SA of objectives in the 2019 Cranbrook Publication Plan

8.1 The Cranbrook Plan DPD, has now (at February 2019), reached the publication stage of production. This is the point, following consultation, at which the plan, the SA, the supporting evidence and representations received during the publication consultation period are sent to the Planning Inspectorate for examination. This chapter of the SA work moves on from assessing the masterplan evidence (appraised in previous chapters of this report) to reviewing content of the actual Cranbrook Plan itself.

8.2 The second chapter of the Publication Cranbrook Plan, following on from the introductory chapter 1, includes a series of plan objectives, grouped under subject headings. Supporting commentary is also provided in respect of the subject headings and objectives. The objectives set a framework for policies that follow later on in the plan.

8.3 The objectives are broad brushed and essentially can be looked upon as being positive and desirable in nature and are line with the objectives of the Local Plan and national policy. It was identified as being appropriate to assess these objectives against the sustainability objectives but given the broad and positive nature of them it was not deemed appropriate to identify alternatives to consider alongside. Furthermore the PPG states that alternatives assessed should be sufficiently distinct to give rise to different effects and it is not seen that alternatives, in this context, could be readily generated.

8.4 Table 8.1, which follows on the next page, provides comparative assessment of the plan objectives against the sustainability objectives. It is particularly concerned with the specific direct impacts that could be expected to arise from implementation of the objective. For this reason most plan objectives are likely to have negligible impacts on most of the sustainability objectives, typically plan objectives will have one or two positive impacts in respect of sustainability objectives.

8.5 The most useful output of this stage of assessment is to be able to review whether the Cranbrook Plan objectives cover all of the sustainability matters identified through the SA sustainability objectives. An important note, in undertaking this assessment of whether plan objectives meet all of the SA objectives, is a discounting of plan objective 31 – *"Cranbrook will develop as a sustainable new town, phased to ensure the community's needs can be met both during development and long into the future."* For this plan objective, in the table on the following page, positive impacts are identified against all SA objectives for the simple reason that the Plan objective is all embracing in respect of sustainable development so by definition it should be compatible with all SA objectives. However the overarching, broad brush and less specific nature of this objective means that the positive effects are minor.

8.6 All of the Cranbrook Publication Plan objectives show some positive impacts, typically with a likelihood to have a significant positive effect, on at least one SA objective; specifically a significant positive effect has been identified where the plan objective most directly corresponds with the thrust of the SA objective.

Table 8.1 - Publication Plan Objectives compared to SA Objectives

SA Objectives	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
01. Health and wellbeing is designed and integrated into all parts of the town to reduce the development of long-term health conditions	0	0	0	++	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
02. A balanced, active community with the best health and wellbeing outcomes in the UK	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
03. The best outdoor environment for everyone, including the young and vulnerable	0	0	0	++	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
04. From the start new technology helps health and wellbeing services work together to provide the most effective services	0	+	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
05. A confident, supportive, balanced and diverse community at the heart of decision making	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
06. Enough community, sport, leisure and cultural facilities and spaces to satisfy the needs of the whole community in Cranbrook and to support and encourage creative projects	0	++	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0
07. Sports and cultural activities are accessible to all, part of the fabric and community of Cranbrook	0	++	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0
08. Cranbrook secures its identity as a small enterprise town with a successful business community, recognised for identifying new business opportunities	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	++
09. Enough affordable business spaces to satisfy the needs of new and existing businesses from in and around Cranbrook	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	++

SA Objectives	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
10. All residents can access excellent education to develop the skills they need to fulfil their ambitions	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+
11. Vibrant town and neighbourhood centres which are busy and successful both in the day and evening	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	++	+
12. To deliver Zero Carbon development in the expansion of Cranbrook	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	++	0	0	0	0
13. Reduce the amount of harmful greenhouse gases Cranbrook sends into the atmosphere by being more energy efficient and making greater use of renewable energy	0	0	0	0	0	0	0	0	0	0	0	0	0	++	0	++	0	0	0	0
14. Be fully informed and prepared for the effects and impact of climate change	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0
15. Encourage and enable residents to minimise their carbon footprint by reducing the need to travel; but where necessary, to travel using sustainable means, comprising the use of public transport, walking and cycling	0	0	0	+	0	0	0	0	0	0	0	++	+	++	0	0	0	0	0	0
16. To encourage the purchasing of local goods and materials by residents and the developers and ensure that waste is recycled wherever possible	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	++	+	0	+
17. The majority of journeys originating from Cranbrook are made using sustainable transport.	0	0	0	+	0	0	0	0	0	0	0	++	+	++	0	0	0	0	0	0
18. An integrated, coordinated transport system enabling people to move easily within Cranbrook and to its neighbours and beyond	0	0	0	+	0	0	0	0	0	0	0	++	+	++	0	0	0	0	0	0

SA Objectives	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
19. An excellent network of safe walking and cycling routes in and around Cranbrook making active transport the first choice	0	0	0	+	0	+	++	0	0	0	0	++	+	++	0	0	0	0	0	0
20. Parking is well designed to not be intrusive or dominant and with enough space to serve the community's needs	0	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0
21. Be ready for future developments in transport technology	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
22. Good quality allotments, community gardening spaces and private gardens encourage people to grow food and enjoy outdoor activity	0	0	0	0	0	0	++	0	+	0	+	0	0	0	0	0	0	0	0	0
23. Green spaces and landscape features within and around Cranbrook are linked and have a variety of functions, making sure that they are as valuable and accessible as possible to the community and wildlife.	0	0	0	++	0	0	++	0	+	0	+	0	0	0	0	0	0	0	0	0
24. Buildings and open spaces include nesting boxes and other features to create wildlife habitats that the community can also enjoy	0	0	0	0	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0
25. Features such as ponds and ditches are used to collect storm water and designed so that they help to create attractive streets and open spaces	0	0	0	0	0	0	0	0	++	+	0	0	++	0	++	0	0	0	0	0
26. To secure buildings and spaces that are designed to encourage good health and wellbeing in residents and visitors of all ages	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
27. A wide range of well designed homes are available to rent and buy	++	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

SA Objectives	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
28. Spaces and buildings are designed to encourage people to talk to one another, allow people to trade goods and services and can easily be adapted to meet the changing needs of the community	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	++	++	+
29. Spaces and buildings are designed to prevent crime and anti-social behaviour without the need for visible security	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
30. Development at Cranbrook recognises change over time and allows flexibility of use and provides opportunity and space for emerging needs of the community.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
31. Cranbrook will develop as a sustainable new town, phased to ensure the community's needs can be met both during development and long into the future.	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+

9 SA of policy wording of the Cranbrook Plan at Publication

9.1 This chapter of the SA is specifically concerned with appraisal of policies and specifically policy wording in the Publication draft of the Cranbrook Plan.

Translation of policies from Preferred Approach to Publication draft

9.2 Before appraising Publication policies it is, however, useful to firstly look at the translation of proposed policy matters identified at the Preferred Approach stage of plan into the Publication draft. In the table over the page potential policy areas/subject matters that were set out in the Preferred Approach consultation are listed against the corresponding policies in the actual Cranbrook Plan Publication draft. Commentary is made where Preferred Approach 'policies' have not been carried forward to publication or where new ones have come in at publication.

9.3 There are some policies (policy subject matters) that featured at the Preferred Approach stage of plan making that are not included in the Publication draft. In some cases they are not carried forward as they are in respect of detailed matters of development that may be physically at or close to Cranbrook but they are not seen as a requirement or essential for Cranbrook delivery and can be implemented through other wider policy agendas or decision making actions. In other cases subject matters that had a stand-alone policy at the Preferred Approach stage of plan making are now addressed through or rapped-up into Publication draft policies covering a number of matters.

9.4 The table over the page, as well identifying the two sets of policies, also provides a brief commentary on policy changes or amendments. This includes a number of new matters, addressed through policy, at this stage of plan making.

Table 9.1 – Policies at Preferred Approach compared to those at Publication

'Policy' at Preferred Approach	Corresponding or New Policy at Publication	Commentary
None	CB1 - Health and Wellbeing at Cranbrook	At Preferred Approach stage of plan making there was no specific overarching proposed policy that dealt explicitly with health and wellbeing matters. There were, however, a number of cross-references to health considerations that appeared in other proposed plan policies and supporting commentary and evidence – these specifically included policy References 2.0, 2.1, 2.2, 2.4, 3.6.1, 4.1.1, 4.1.3, 4.3.1, 4.4.1, 4.4.2 and 4.4.4, . CB1 is, therefore, a new policy that has been introduced at publication stage of plan making. Given the overarching importance attached to health and wellbeing considerations it was identified to be appropriate to include an explicit policy on the subject matter; absence of a policy may down play relevance of health. Section 8 of the NPPF explicitly promotes health outcomes and objectives from planning.
Ref 2.0 - Area Specific requirements – Bluehayes (Western Area)	CB2 - Bluehayes Expansion Area	This policy is a refinement of the Preferred Approach policy. Inclusion in the plan is based on the need to give clarity over development expectations, absence of a policy would lead ambiguity or lack of clarity over expectations. The NPPF, at paragraph 72, refers to planning for strategic scale development sites, specifically for housing, and this policy is compatible with objectives in national policy.
Ref 2.1 - Area Specific requirements – Treasbeare (Southwestern Area)	CB3 - Treasbeare Expansion Area	This policy is a refinement of the Preferred Approach policy. Inclusion in the plan is based on the need to give clarity over development expectations, absence of a policy would lead ambiguity or lack of clarity over expectations. The NPPF, at paragraph 72, refers to planning for strategic scale development sites, specifically for housing, and this policy is compatible with objectives in national policy.
Ref 2.2 - Area Specific requirements - Cobdens (Eastern area)	CB4 - Cobdens Expansion Area	This policy is a refinement of the Preferred Approach policy. Inclusion in the plan is based on the need to give clarity over development expectations, absence of a policy would lead ambiguity or lack of clarity over expectations. The NPPF, at paragraph 72, refers to planning for strategic scale development sites, specifically for housing, and this policy is compatible with objectives in national policy.

'Policy' at Preferred Approach	Corresponding or New Policy at Publication	Commentary
Ref 2.3 - Area Specific requirements - Grange (south eastern Area)	CB5 - Grange Expansion Area	This policy is a refinement of the Preferred Approach policy. Inclusion in the plan is based on the need to give clarity over development expectations, absence of a policy would lead ambiguity or lack of clarity over expectations. The NPPF, at paragraph 72, refers to planning for strategic scale development sites, specifically for housing, and this policy is compatible with objectives in national policy.
None	CB6 - Cranbrook Infrastructure	At the Preferred Approach stage of plan making there was no single specific policy that provided for securing infrastructure deliverer, though a number of policies did refer to infrastructure provision associated with wider development matters, these included policy references 1.0, 2.0, 2.1, 2.2, 2.3, section 3 policies, 4.3.1 and 4.4.3, . This policy is, therefore, new at Publication stage and gives clarity in one place over infrastructure requirements, absence of a policy would lead ambiguity or lack of clarity over expectations. Paragraph 20 of the NPPF advises of the appropriateness of policies planning for infrastructure provision. Paragraph 34 of the NPPF refers to infrastructure provision through developer contributions.
Ref 4.4.2 - Design – Phasing Plans to Support Applications	CB7 - Phasing	This policy is a refinement of the Preferred Approach policy. Note that this policy number (4.4.2) was used in the SA of the Preferred Approach document but in the actual plan consultation document had number 4.4.3. Policy provides clarity in respect of phasing and without a policy there could be uncertainty over delivery and timing of delivery.
None	CB8 - Cranbrook and Broadclyst Station Built-up Area Boundaries	This policy is new at publication stage of plan making. At the Preferred Approach stage of plan making (and in the adopted local plan) the extent of development was established, to some degree, through specific land allocations. It is relevant to note, as well, that there have been a number of small scale planning applications at and around Cranbrook that are not on allocated land but some of which may have been seen to be within the town. Introduction of this policy will give clear and more explicit policy guidance and coverage In respect of limits to development, absence of policy would mean this clarity is not provided.
None	CB9 - Public Transport Enhancement	Whilst this is a new policy at Publication stage it does, to some degree, supersede and cover proposed policy coverage in Ref 3.1.1, 3.1.2, 3.1.3 and 3.2.1 and in a wider sense matters in other policy references. Its inclusion is seen as important as it sets out very clear requirements for rail and bus provision and improvements, without a policy there would be a lack of clarity. Section 9 of the NPPF explicitly promotes public transport provision and planning in the context of public transport.

'Policy' at Preferred Approach	Corresponding or New Policy at Publication	Commentary
Ref 3.1.3 – Strategic Infrastructure - A second railway station at Cranbrook	CB10 - Safeguarding of Land for a Second New Station at Cranbrook	This policy is a refinement of the Preferred Approach policy. It ensures that should there be funds and means to build a station in the future there will be land available to accommodate it, without a policy future station provision may not be possible. Securing a new station would accord with NPPF objectives, see for example section 9, for public transport.
None	CB11 - Cranbrook Affordable Housing	This policy is new at publication stage of plan making. It was deemed appropriate to include it in order to establish clear expectations of affordable housing requirements at Cranbrook and without it there would be a lack of clarity. Numerous references are made in the NPPF to securing affordable housing but especially so in section 5.
None	CB12 - Cranbrook Custom and Self-build housing	This policy is new at publication stage of plan making. It was deemed as appropriate to include it in order to establish clear expectations of affordable housing requirements at Cranbrook. Securing custom and Self-build housing is seen as positive goal for the new town and absence of policy could frustrate ability to deliver. Paragraph 61 of the NPPF promotes custom build housing.
None	CB13 - Delivering Zero Carbon	This policy is new at publication stage of plan making. Whilst there were past reverences to low carbon development inclusion of a specific policy was deemed appropriate to establish clear expectations from and of for development. Absence of policy would frustrate efforts to deliver zero carbon outcomes. Paragraph 148 of the NPPF supports transition to a low carbon future with 151 providing more guidance for policies.
Ref 3.5.1 - Strategic Infrastructure – Energy – Land for District Heating Centre	CB14 - Safeguarding of Land for Energy Uses	This policy is a refinement of the Preferred Approach policy. It seeks to safeguard land to promote zero carbon technologies. Absence of policy could result in insufficient land or space to implement measures on the future.
Ref 3.7.1 - Strategic Infrastructure - Provision of on-site SANGS	CB15 - Delivery of Suitable Alternative Natural Green Space (SANGS)	This policy is a refinement of the Preferred Approach policy. Delivery of SANGs has been identified as a requirement under habitat mitigation assessment work and this policy sets out requirements. It should be noted that a separate Habitat Regulations Assessment is to be produced for the Cranbrook Plan. Absence of policy would lead to lack of clarity about requirements and locations for provision.
Ref 4.4.1 - Design – Design Codes for Allocation Areas	CB16 - Design Codes and Place Making	Publication Policy CB24 is a refinement of Preferred Approach policies and addresses design code and place making considerations. Note that this policy number was used in the SA of

'Policy' at Preferred Approach	Corresponding or New Policy at Publication	Commentary
Ref 4.4.3 - Design – Building for Life		the Preferred Approach document but in the actual plan consultation document had number 4.4.4. In the absence of policy standards may not be provided.
None	CB17 - Amenity of future Occupiers	This policy is new at publication stage of plan making. Inclusion of a policy was deemed appropriate to explicitly ensure that amenity considerations for residents will be addressed in determination of planning applications. Paragraph 127 f) of the NPPF specifically refers to taking amenity considerations into account. Absence of policy could mean that adequate amenity provision is not provided.
Ref 4.2.2 - Economy & Enterprise – Delivery of Wi-Fi hotspots	CB18 – Digital Connectivity	This policy is a refinement of the Preferred Approach policy to ensure digital connectivity is secured and without this policy appropriate provision may not occur.
None	CB19 – Coordinated sustainable travel	This is a new policy at Publication stage of plan making, though it should be noted that in Policy 3.6.1 at Preferred Approach stage there was reference to community and shared transport schemes. Policy will require production of travel plans and encourage car sharing and electric bikes.
Ref 4.1.2 - Development management - Movement and Transport – Electric Car Charging	CB20 - Plug-In and Ultra low Emission vehicle charging	This policy is a refinement of the Preferred Approach policy. Policy seeks to ensure provision is made for vehicle charging. Paragraph 105 e) of the NPPF supports policy for charging points. Absence of policy could result in lack of facilities and infrastructure for vehicle charging.
Ref 4.4.6 - Design – Minimum parking space sizes Ref 4.1.3 - Development management Policies - Movement and Transport – Cycle Parking	CB21 - Parking at Cranbrook	Policy CB24 policy is a refinement of the Preferred Approach policies. It should be noted that policy number 4.4.6 was used in the SA of the Preferred Approach document but in the actual plan consultation document had number 4.4.7. Paragraph 105 of the NPPF sets out guidance on setting parking policies in plans. Policy CB24 establishes car and bike parking standards at Cranbrook and it is absence there may be inappropriate or inadequate provision. It should be noted the cycle parking standards are drawn from and incorporate Preferred Approach Policy number Ref 4.1.3.
Ref 2.4 - Area Specific requirements - Town Centre	CB22 - Cranbrook Town Centre	This policy is a refinement of the Preferred Approach policy. The policy sets out expectations and requirements for a successful town centre and without out it there would be less certainty around provision. Section 7 of the NPPF specifically addresses the importance of vibrant town centres.

'Policy' at Preferred Approach	Corresponding or New Policy at Publication	Commentary
None	CB23 - Residential Development in the Town Centre and Neighbourhood Centres	This policy is new at publication stage of plan making. Inclusion of a policy was deemed appropriate to explicitly support and seek to secure provision of residential uses to ensure a greater critical mass of people in the town centre to make use of and have easy access to services and facilities the town centre will offer. Residential accommodation in the town centre, so long as it does not undermine or adversely impact on commercial and cultural activity, will also bring additional activity and life as an extra dimension to regular town centre uses. Residential development may be most applicable in locations where commercial activity would not be expected to be viable, or otherwise inappropriate. Absence of policy would not provide clarity over expectations.
None	CB24 - London Road Commercial and retail proposals	This policy is essentially new at publication stage of plan making, noting that Policy Ref 3.3.1 at Preferred Approach stage of plan making was in respect of London Road improvements but it covered road junction issues as opposed to commercial frontage considerations as this policy at Publication addresses.
Ref 3.3.1 - Strategic Infrastructure - London Road Improvements	CB25 - London Road Improvements	The policy at Publication stage covers a broader range of matters than that at Preferred Approach stage of plan making. Policy seeks to provide a more comprehensive coverage of planning and development matters in respect of the treatment and future of London Road, in particular through promoting commercial activity. Absence of policy would frustrate potential to promote the commercial role that this road may play.
None	CB26 - Allotments	Although covered to a limited degree by Policy Ref 3.6.1 this is, in effect, a new policy at Publication stage of plan making. It is geared around securing high quality and accessible allotment and gardening provision. Paragraph 91 c) of the NPPF promotes allotment provision through planning policies. Without policy provision may not be made.
Ref 4.3.2 - Green Infrastructure & Ecology – Landscape, Biodiversity and Drainage Strategy	CB27 - Landscape Biodiversity and Drainage	This policy is a refinement of the Preferred Approach policy. It requires provision of a strategy without which landscape, biodiversity and drainage issues may not be appropriately addressed in the expansion areas.

'Policy' at Preferred Approach	Corresponding or New Policy at Publication	Commentary
None	CB28 - Design and Construction of Sports Pitches	This policy is new at publication stage of plan making. Inclusion of a policy was deemed appropriate to explicitly ensure that sports pitches are constructed in an appropriate manner and are supported by changing facilities and other accommodation. Without policy appropriate provision may not be secured.
None	CB29 - Tillhouse Farm Redevelopment	This policy is new at publication stage of plan making. Tillhouse Farm is a listed property that is in a poor state of repair, it forms one of the few heritage assets at Cranbrook. Introduction of a policy was deemed as appropriate in order to afford protection to the farm and actively encourage a positive new use. Without the policy the heritage asset, and scope for reuse, would not have the same degree of protection. Section 16 of the NPPF and specifically paragraph 185 a) promote heritage asset protection and appropriate reuse.
Ref 1.0 - Allocations - Expansion areas	No corresponding Policy	Whilst there was policy coverage at the Preferred Approach stage of plan making it was not deemed appropriate to have explicit policy at publication stage advising that land would be allocated because, by default, the issue of land allocations is covered in policies CB2 to CB5.
Ref 2.5 - Area Specific requirements - Gypsy and Traveller Allocation	No corresponding Policy	Whilst there was policy coverage at the Preferred Approach stage of plan making it was not deemed appropriate to have explicit policy at Publication stage advising that land would be allocated because land allocation policies CB3 and CB4 include reference and show sites for gypsy and traveller use.
Ref 2.6 - Area Specific requirements - Education Land	No corresponding Policy	Whilst there was policy coverage at the Preferred Approach stage of plan making it is not identified as needed at Publication stage of plan making. The education requirements are now bound up in Policies CB2-5 for on-site provision and CB6 for off-site secondary provision so a separate policy is no longer required
Ref 3.1.1 - Strategic Infrastructure – Rail – Passing Loop	No corresponding Policy	Whilst there was policy coverage at the Preferred Approach stage of plan making it is not identified as needed at Publication stage of plan making. A rail passing loop may be a desirable infrastructure improvement, with East Devon wide and broader benefits, but it is not seen to be a Cranbrook specific requirement and as such a stand-alone policy coverage in the Cranbrook Plan is not needed (there is, however, potential benefit for cross-reference in other plan policies or reasoned justification, potentially in CB6 or CB7).

'Policy' at Preferred Approach	Corresponding or New Policy at Publication	Commentary
Ref 3.1.2 - Strategic Infrastructure – Second Platform at Cranbrook Station	No corresponding Policy	Whilst there was policy coverage at the Preferred Approach stage of plan making it is not identified as needed at Publication stage of plan making. A second platform at Cranbrook station may be a desirable infrastructure improvement but it is not seen to be an explicit requirement for the future development of Cranbrook (there is, however, perhaps potential benefit for cross-reference in other plan policies or reasoned justification, potentially in CB6 or CB7).
Ref 3.4.1 - Strategic Infrastructure - Exeter Airport and navigational Aids	No corresponding Policy	It is understood that navigational aid improvements at the airport are to be implemented through development proposals that are independent of the Cranbrook Plan and its policies and there is not a need for Cranbrook plan policy coverage.
Ref 3.5.2 - Strategic Infrastructure – Energy - district heating throughout the development	No corresponding Policy	Whilst there was policy coverage at the Preferred Approach stage of plan making it is not identified as explicitly needed at Publication stage of plan making. As matters are covered in Policy CB13 – delivering zero Carbon.
Ref 3.6.1 - Strategic Infrastructure - Community Development - community infrastructure	No corresponding Policy	The key community infrastructure requirements set out in this policy at Preferred Approach stage of plan making are largely covered by policy provision elsewhere in the Cranbrook Plan at Publication stage (most notably Policy CB2-5 and CB20) and therefore an explicit policy on the subject matter is not deemed as necessary.
Ref 4.1.1 – DM Policies – Movement and Transport – Travel plan	No corresponding Policy	Whilst there was policy coverage at the Preferred Approach stage of plan making in respect of requiring provision of a travel plan it is not identified as needed in a stand-alone policy at Publication stage of plan making as travel plan provision is covered in Policy CB23.
Ref 4.1.4 - Development management Policies - Movement and Transport – New Fuel Station	No corresponding Policy	Whilst there was policy coverage at the Preferred Approach stage of plan making in respect of a new fuel station (petrol filling station) this was not deemed relevant for inclusion at Publication stage. It should be noted that there is an existing petrol filling station at Cranbrook on London Road and more significantly there is explicit policy at Publication stage of plan making in respect of electric vehicle charging plug in points. Absence of policy would not, in itself, stop a scheme coming forward.

'Policy' at Preferred Approach	Corresponding or New Policy at Publication	Commentary
Ref 4.2.3 - Economy & Enterprise – Business Space and Business Ladder	No corresponding Policy	Whilst there was policy coverage at the Preferred Approach stage of plan making it is not identified as needed at Publication stage of plan making. There is however reference to the business ladder in objective and policy justification for Policy CB16. The Business ladder concept is primarily concerned with the creation and expansion of businesses rather than explicitly land use planning considerations.
Ref 4.3.1 - Green Infrastructure & Ecology – Open Space Provision	No corresponding Policy	Whilst there was explicit policy coverage at the Preferred Approach stage of plan making it is not identified that a stand-alone policy is needed at Publication stage of plan making. Green infrastructure provision is referenced at various points in the Publication plan and explicitly so in Policy CB26.
Ref 4.4.2 – Design – Passive solar gain and outside space	No corresponding Policy	Whilst there was explicit policy coverage at the Preferred Approach stage of plan making it is not identified that a stand-alone policy is needed at Publication stage of plan making. Passive solar gain is in the Publication plan explicitly in Policy CB13. It should be noted that the SA at Preferred Approach stage of plan making did not assesses this policy.
Ref 4.4.4 - Design – Adaptable Buildings and Spaces	No corresponding Policy	Whilst there was explicit policy coverage at the Preferred Approach stage of plan making it is not identified that a stand-alone policy is needed at Publication stage of plan making. Policy CB24 covers, to some degree, the matters that this Preferred Approach policy may have covered. It should be noted that this policy number was used in the SA of the Preferred Approach document but in the actual plan consultation document had number 4.4.5.
Ref 4.4.5 - Design – Refuse Storage Facilities	No corresponding Policy	Whilst there was explicit policy coverage at the Preferred Approach stage of plan making it is not identified that a stand-alone policy is needed at Publication stage of plan making. Policy CB24 covers, to some degree, the matters that this Preferred Approach policy may have covered. It should be noted that this policy number was used in the SA of the Preferred Approach document but in the actual plan consultation document had number 4.4.5. It should be noted that this policy number was used in the SA of the Preferred Approach document but in the actual plan consultation document had number 4.4.6.
Ref 3.2.1 - Strategic Infrastructure - High quality bus services	No corresponding Policy	Whilst there is not an explicit directly compatible policy at Publication stage the matters at Preferred Approach stage are covered, to some degree, in Publication Policy CB07.

Sustainability Appraisal of Policies in the 2019 Publication draft of the plan

9.5 Having reviewed the translation of policies from the 2017 Preferred Approach document to the 2019 version this next stage of appraisal work assesses the policies in the Cranbrook Plan and compares the policy approaches against alternatives. The alternative options referred to in this chapter have been identified by Planning Policy officers of East Devon District Council as reasonable alternatives to the approach in the publication draft. It should be noted, however, that in some cases it has not been appropriate to identify alternatives, where this is the case explanation is provided. The earlier appraisal work has in some cases helped establish and define what the reasonable alternative options may be (and by implication some options that have been ruled out as unreasonable).

9.6 A number of the policies in the Publication draft of the plan allocate land or sites for development or specific uses or in other respects they spatially identify the geographic coverage of policy. The Policies Map for Cranbrook sets out the spatial extent or applicability of policy coverage.

9.7 The next chapter (Chapter 10) of this appraisal is specifically concerned with potential development sites and areas; it forms an assessment of suitability of land areas for development in general, without being explicit about uses. In this Chapter of appraisal of plan policies there are some cross-references to specific sites for development. These cross references are made where a policy in the plan is explicit about where a use is to be located, as determined on the policies map.

9.8 In undertaking assessment of Publication plan policy, and reasonable alternatives, a pro-forma approach, applied on a policy by policy basis has been established and applied.

Policy CB1 - Health and Wellbeing at Cranbrook

9.9 The policy sets out a broad framework (as opposed to precise and explicit requirements, for example quantified measures) to promote health and wellbeing outcomes at Cranbrook. Its sets out a series of criteria that development proposals will be judged against to determine whether planning permission should be granted. This policy is written in the context of the fact that Cranbrook has been selected as one of ten NHS England Healthy New Town demonstrator sites and in late 2017 was selected by Sport England, as part of wider joint bid with Exeter, to be one of twelve Local Delivery locations aiming to build healthier more active communities and tackle stubborn inequalities.

9.10 The reasoned justification to Cranbrook Plan policy notes that it is necessary to provide, places that support good jobs, the means to develop accessible social networks, and the delivery of excellent education, all set within attractive, green environments. Whilst the policy presents a broader set of requirements these can be looked upon as key themes or elements on policy coverage.

Alternative Options

9.11 Through the appraisal work undertaken to date the in-principle approach of promoting health and wellbeing has been established and this approach is reflected in national Planning Policy - see references in the NPPF at, for example, paragraphs 8b), 20 c), 30, 103, 116, 117, 112 e), 127 f) and 180 and specifically section 8. No (in-principle) alternative options to promoting health and wellbeing through policy are identified. Given that alternatives to promoting health are not seen as realistic (for example it would not be seen as a realistic choice to consider explicitly planning for a town where people will be unhealthy) the objective of promoting health and wellbeing, compared to alternatives, is not appraised.

9.12 In commentary on the policy and its possible impacts on SA objectives references are made to sustainability considerations that are specifically covered, to as lesser or greater degree through policy. The comparison of policy objectives, the criteria, against SA objectives is tabled below.

Direct impacts

9.13 The policy is explicitly concerned with promoting positive health benefits and on this account is recorded as having likely significant positive effects when measured against SA objective 4 – health. As so much of health is related to physical exercise and social and cultural interaction, and policy criteria refer explicitly to these themes, a likely significant positive effects when measured against SA objective 7 – leisure and recreation is also recorded. There are a number of cases where minor positive impacts are identified against SA objectives, these are 1 – housing, 2 – community services, 3 - educations and skills and 14 – greenhouse gas emissions. Policy seeks a high quality environment at Cranbrook, for example through well designed spaces and links between them as well as community facilities, hence the minor positives. In additions a minor positive impacts though with some degree of uncertainty (as denoted by a question mark) is raised in respect of noise – SA Objective 6. It could be inferred, given that noise can be a significant cause or

contributor to ill health, that application of policy would have minor positive benefits, but lack of explicit reference to noise matters leaves some possible uncertainty.

9.14 For most SA objectives the application of policy is seen as having negligible obvious and clear direct impacts. In these cases there would be no expectation of negative impacts and it could be reasonable expected that some positives benefits (to some degree) could arise but lack of obvious explicit links or references in policy to the SA objective themes generates a negligible impact scoring.

Secondary, cumulative and synergistic impacts

9.15 There can be expectations of wide ranging secondary, cumulative and synergistic impacts through promoting and securing of good health. Healthy people, for example, are more likely to be employed and being employed with the benefits that generate, such as helping to afford and live in good quality housing, can be expected to promote positive health outcomes.

Permanence and timescale of impacts

9.16 Timing wise the speed of benefits being secured can be expected to relate to the pace or speed at which infrastructure, services and facilities are built. Though even within discreet parcels of development, for example blocks of new housing, there can be expected to be positive health benefits, through implementation of plan policy, at the point of or soon after implementation. Whilst change can and will happen, over the years and decades, establishing positive actions and outcomes earlier on should be expected to lead to permanent benefits

Scope for mitigation

9.17 With no expectations of negative impacts there are no explicit mitigation measures or actions seen as necessary. It is noted, however, that policy as drafted does not explicitly and directly cover all sustainability matters that featuring in SA objectives.

Table 9.2 - SA appraisal of CB1 – Health and Wellbeing at Cranbrook

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
To include policy CB1 which promotes health and wellbeing at Cranbrook as drafted – covering a broad range of objectives centred on design themes.	+	+	+	++	0	+ ?	++	0	0	0	0	0	0	+	0	0	0	0	0	0

Policy CB2 - Bluehayes Expansion Area

9.18 The policy expectation is that within the Bluehayes Western expansion area as allocated under CB2 provision will be made for mixed use development specifically including (summarising plan policy):

- 960 new dwellings;
- A mixed use area – to include a community building, business space and other compatible uses;
- At least 5.5 hectares of open space;
- A 420 place primary school;
- 2,100 m^2 of play space.
- 0.5 hectares of allotments; and
- Cycling and footpath links.

Alternative Options

9.19 The earlier SA work points to the suitability of land to the west of Cranbrook for mixed use development and as such no alternatives options are appraised. However, through and following assessment there is subsequent commentary on aspects of policy. Comparison of policy against SA objectives is set out in the table below.

9.20 It should be noted that this aspect of assessment is broad brush in nature and is concerned with in-principle issues of expansion of Cranbrook in a westerly direction rather than expansion in respect of specific site boundaries. Chapter 10 of this appraisal looks in detail at site and land area specific details.

Direct impacts

9.21 Because of direct references to certain facilities, that align with SA objectives, there are a number of significant positive effects noted through implementation of plan policy – these significant positives are identified against SA objectives of – 1 housing, 2 community services, 3 education and skill and 12 – sustainable transport. Proximity to other services also see significant positive impacts in respect of 4 - health and for 14 – greenhouse gas emissions the site is well served by public transport, including easy access to the station. Direct positive benefits are also identified against some other SA objectives though, on account of no clear and obvious policy references, there are negligible impacts associated with a number of the SA objectives. Given that it is a large site, with expectations that a lot of waste may be expected, a significant negative impact is identified against SA objective 17 for waste. Minor negatives, with some uncertainties are recorded for 6 – noise, 8 – historic environment and 9 – landscape character.

Secondary, cumulative and synergistic impacts

9.22 There can be expectations of knock-on impacts arising in respect of what flows from this policy into implementation of schemes and more detailed plan policies. Specific detailed commentary is not provided at this point of appraisal but under a well-developed scheme

for the allocation many of the SA objectives could see some types of positive related impact; though conversely a poor executed scheme could see negative impacts.

Permanence and Timescale of impacts

9.23 The development that policy will provide for, and the impacts arising, can be expected to be permanent in nature. There is, however, an importance of early delivery of social and community facilities.

Scope for Mitigation

9.24 The main potential for negative impacts arises from the generation of SA objective 17 – waste and there could be potential scope for mitigation in plan policy or elsewhere in the plan. Lesser impacts are associated with SA objective 6 - noise though it is noted that amenity protection references appear elsewhere in the plan, 8 Historic environment, 9 - landscape character and 13 Air, soil and water. Though references to avoiding adverse impacts are noted elsewhere in the plan.

Table 9.3 - SA appraisal of CB2 – Bluehayes Expansion Area

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Mixed use development a specifically including (summarising plan policy): • 975 new dwellings; • A mixed use area – to include a community building, business space and other compatible uses; • At least 5.5 hectares of open space; • A 420 place primary school; • 2,100 m2 of play space. • 0.5 hectares of allotments; and • Cycling and footpath links.	++	++	++	++	0	-?	+	- ?	-	0	0	++	-	++	0	0	- -	+	+	+

Policy CB3 - Treasbeare Expansion Area

9.25 The policy expectation is that within the Treasbeare expansion area as allocated under CB3 provision will be made for mixed use development specifically including (summarising plan policy):

- 910 new dwellings;
- A mixed use area – to include a community building, a range of shops, business space and other compatible uses;
- At least 5.5 hectares of open space;
- A 420 place primary school;
- Formal open space of at least 2.1 hectares;
- Amenity space of at least 0.75 hectares
- Formal play space;
- A sports hub with a wide range of pitches/facilities;
- Employment land of 4.9 hectares;
- Allotments covering 0.5 hectares;
- 10 gypsy and traveller pitches;
- Land reserved for a District Heating Energy Centre; and
- Cycling and footpath links.

Policy explicitly notes that noise levels of occupiers of dwellings should not exceed 55 decibels.

Alternative Options

9.26 The earlier SA work points to the suitability of this allocation for mixed use development and as such no alternatives options are appraised. However, through and following assessment there is subsequent commentary on aspects of policy. Comparison of policy against SA objectives is set out in the table below.

9.27 It should be noted that this aspect of assessment is broad brush in nature and is concerned with in-principle issues of expansion of Cranbrook in a south westerly direction rather than expansion in respect of specific site boundaries. Chapter 10 of this appraisal looks in detail at site and land area specific details.

Direct impacts

9.28 Because of direct references to certain facilities, that align with SA objectives, there are a number of significant positive effects noted through implementation of plan policy – these significant positives are identified against SA objectives of – 1 housing, 2 community services, 3 education and skill and 12 – sustainable transport. Proximity to other services also see significant positive impacts in respect of 4 - health and for 14 – greenhouse gas emissions the site is well served by public transport. Direct positive benefits are also identified against some other SA objectives though, on account of no clear and obvious

policy references, there are negligible impacts associated with a number of the SA objectives. Given that it is a large site, with expectations that a lot of waste may be expected, a significant negative impact is identified against SA objective 17 for waste. Minor negatives, with some uncertainties are recorded for 6 – noise, 8 – historic environment and 9 – landscape character. With respect to noise a specific qualification is made in so far as the site being in close proximity to the airport and it is noted that policy wording refers to noise considerations.

9.29 It should be noted that provision of a sports hub and gypsy and traveller pitches have distinct positive benefits that are worthy of particular mention. A significant positive impact is also identified against SA objective 14 greenhouse gas emissions.

9.30 Direct positive benefits are also identified against some other SA objectives though, on account of no clear and obvious policy references, there are negligible impacts associated with a number of the SA objectives.

Secondary, cumulative and synergistic impacts

9.31 There can be expectations of knock-on impacts arising in respect of what flows from this policy into implementation of schemes and more detailed plan policies. Specific detailed commentary is not provided at this point of appraisal but under a well-developed scheme for the allocation many of the SA objectives could see some types of positive related impact; though conversely a poor executed scheme could see negative impacts.

Permanence and Timescale of impacts

9.32 The development that policy will provide for, and the impacts arising, can be expected to be permanent in nature. There is, however, an importance of early delivery of social and community facilities.

Scope for Mitigation

9.33 The main potential for negative impacts arises from the generation of SA objective 17 – waste and there could be potential scope for mitigation in plan policy or elsewhere in the plan. Lesser impacts are associated with SA objective 6 - noise though it is noted that amenity protection references appear elsewhere in the plan, 8 Historic environment, 9 - landscape character and 13 Air, soil and water. Though references to avoiding adverse impacts are noted elsewhere in the plan.

Table 9.4 - SA appraisal of Policy CB3 Treasbeare Expansion Area

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy CB3 provides for mixed use development specifically including (summarising plan policy): • 910 new dwellings; • A mixed use area – to include a community building, a range of shops, business space and other compatible uses; • At least 5.5 hectares of open space; • A 420 place primary school; • Formal open space of at least 2.1 hectares; • Amenity space of at least 0.75 hectares • Formal play space; • A sports hub with a wide range of pitches/facilities; • Employment land of 4.9 hectares; • Allotments covering 0.5 hectares; • 10 gypsy and traveller pitches; • Land reserved for a District Heating Energy Centre; and • Cycling and footpath links. Policy explicitly notes that noise levels of occupiers of dwellings should not exceed 55 decibels.	++	++	++	++	0	-?	+	- ?	-	0	0	++	-	++	0	0	- -	+	+	+

Policy CB4 - Cobden Expansion Area

9.34 The policy expectation is that within the Cobdens expansion area as allocated under CB4 provision will be made for mixed use development specifically including (summarising plan policy):

- 1,490 new dwellings;
- A mixed use area – to include a community building, a range of shops, business space and other compatible uses;
- Formal open space of 3,500 SqM;
- A 630 place primary school and 50 place special needs school;
- Formal open space of at least 3.4 hectares;
- Amenity space of at least 0.75 hectares
- A sports hub with a wide range of pitches/facilities;
- Allotments covering 0.8 hectares;
- 10 gypsy and traveller pitches;
- Serviced land for a place of worship;
- Serviced land for a cemetery.

Alternative Options

9.35 The earlier SA work points to the suitability of land to the east of Cranbrook for mixed use development and as such no alternatives options are appraised. However, through and following assessment there is subsequent commentary on aspects of policy. Comparison of policy against SA objectives is set out in the table below.

9.36 It should be noted that this aspect of assessment is broad brush in nature and is concerned with in-principle issues of expansion of Cranbrook in a easterly direction rather than expansion in respect of specific site boundaries. Chapter 10 of this appraisal looks in detail at site and land area specific details.

Direct impacts

9.37 Because of direct references to a number of facilities, that align with SA objectives, there are a number of significant positive effects noted through implementation of plan policy – these significant positives are identified against SA objectives of – 1 housing, 2 community services, 3 education and skills, 7 – leisure and recreation and 12 – sustainable transport.

9.38 Proximity to other services also see significant positive impacts in respect of 4 - health and for 14 – greenhouse gas emissions with an expectation that the site should be well served by public transport, with possibility of a second new station in easy access. . Direct positive benefits are also identified against some other SA objectives though, on account of no clear and obvious policy references, there are negligible impacts associated with a number of the SA objectives. Given that it is a large site, with expectations that a lot of waste may be expected, a significant negative impact is identified against SA objective 17

for waste. Minor negatives, with some uncertainties are recorded for 6 – noise, 8 – historic environment and 9 – landscape character.

Secondary, cumulative and synergistic impacts

9.39 There can be expectations of knock-on impacts arising in respect of what flows from this policy into implementation of schemes and more detailed plan policies. Specific detailed commentary is not provided at this point of appraisal but under a well-developed scheme for the allocation many of the SA objectives could see some types of positive related impact; though conversely a poor executed scheme could see negative impacts.

Permanence and Timescale of impacts

9.40 The development that policy will provide for, and the impacts arising, can be expected to be permanent in nature. There is, however, an importance of early delivery of social and community facilities.

Scope for Mitigation

9.41 The main potential for negative impacts arises from the generation of SA objective 17 – waste and there could be potential scope for mitigation in plan policy or elsewhere in the plan. Lesser impacts are associated with SA objective 6 - noise though it is noted that amenity protection references appear elsewhere in the plan, 8 Historic environment, 9 - landscape character and 13 Air, soil and water. Though references to avoiding adverse impacts are noted elsewhere in the plan.

Table 9.5 - SA appraisal of Policy CB4 - Cobden Expansion Area

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy CB3 provides for mixed use development specifically including (summarising plan policy): • 1,490 new dwellings; • A mixed use area – to include a community building, a range of shops, business space and other compatible uses; • Formal open space of 3,500 SqM; • A 630 place primary school and 50 place special needs school; • Formal open space of at least 3.4 hectares; • Amenity space of at least 0.75 hectares • A sports hub with a wide range of pitches/facilities; • Allotments covering 0.8 hectares; • 10 gypsy and traveller pitches; • Serviced land for a place of worship; • Serviced land for a cemetery.	++	++	++	++	0	-?	++	- ?	-	0	0	++	-	++	0	0	- -	+	+	+

Policy CB5 - Grange Expansion Area

9.42 The policy expectation is that within the Cobdens expansion area as allocated under CB4 provision will be made for mixed use development specifically including (summarising plan policy):

- Around 800 new homes;
- A mixed use area – to include a community building, a range of shops, business space and other compatible uses;
- Formal open space of 1.7 hectares;
- Amenity space of 0.6 hectares;
- Play spaces 1,800 SqM; and
- Allotments of 0.4 hectares.

Alternative Options

9.43 The earlier SA work points to the suitability of land to the east of Cranbrook for mixed use development and as such no alternatives options are appraised. However, through and following assessment there is subsequent commentary on aspects of policy. Comparison of policy against SA objectives is set out in the table below.

9.44 It should be noted that this aspect of assessment is broad brush in nature and is concerned with in-principle issues of expansion of Cranbrook in a easterly direction rather than expansion in respect of specific site boundaries. Chapter 10 of this appraisal looks in detail at site and land area specific details.

Direct impacts

9.45 Because of direct references to a number of facilities, that align with SA objectives, there are a number of significant positive effects noted through implementation of plan policy – these significant positives are identified against SA objectives of – 1 housing, 2 community services, 3 education and skills, 7 – leisure and recreation and 12 – sustainable transport.

9.46 Proximity to other services also see significant positive impacts in respect of 4 - health and for 14 – greenhouse gas emissions with an expectation that the site should be well served by public transport. Direct positive benefits are also identified against some other SA objectives though, on account of no clear and obvious policy references, there are negligible impacts associated with a number of the SA objectives. Given that it is a large site, with expectations that a lot of waste may be expected, a significant negative impact is identified against SA objective 17 for waste. Minor negatives, with some uncertainties are recorded for 6 – noise, 8 – historic environment and 9 – landscape character. It should be noted that in Chapter 10 of this guidance a number of smaller land parcels have been appraised that collective make up this Grange allocation. The appraisal of the individual separate land parcels generate outputs that differ in some respects from the appraisal of the allocation CB5 overall.

Secondary, cumulative and synergistic impacts

9.47 There can be expectations of knock-on impacts arising in respect of what flows from this policy into implementation of schemes and more detailed plan policies. Specific detailed commentary is not provided at this point of appraisal but under a well-developed scheme for the allocation many of the SA objectives could see some types of positive related impact; though conversely a poor executed scheme could see negative impacts.

Permanence and Timescale of impacts

9.48 The development that policy will provide for, and the impacts arising, can be expected to be permanent in nature. There is, however, an importance of early delivery of social and community facilities.

Scope for Mitigation

9.49 The main potential for negative impacts arises from the generation of SA objective 17 – waste and there could be potential scope for mitigation in plan policy or elsewhere in the plan. Lesser impacts are associated with SA objective 6 - noise though it is noted that amenity protection references appear elsewhere in the plan, 8 Historic environment, 9 - landscape character and 13 Air, soil and water. Though references to avoiding adverse impacts are noted elsewhere in the plan.

Table 9.6 - SA appraisal of Policy CB5 - Grange Expansion Area

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy CB5 provides for mixed use development specifically including (summarising plan policy): • Around 800 new homes; • A mixed use area – to include a community building, a range of shops, business space and other compatible uses; • Formal open space of 1.7 hectares; • Amenity space of 0.6 hectares; • Play spaces 1,800 SqM; and • Allotments of 0.4 hectares.	++	++	++	++	0	-?	++	- ?	-	0	0	++	-	++	0	0	- -	+	+	+

Policy CB6 - Cranbrook Infrastructure Delivery

9.50 Policy CB6 of the Cranbrook Plan seeks to secure infrastructure provision to match new housing development. Policy seeks to ensure delivery of infrastructure at and through site allocations (policies CB 2 to CB5) as well as through other developments. Reasoned justification to policy cross-references to other polices in the plan that detail infrastructure requirements set out elsewhere in the plan.

Alternative Options

9.51 The alternative identified to having policy that directly seeks infrastructure provision is to not have a policy and to assume or trust that infrastructure will be provided, such an approach is appraised but generates a number of uncertainties.

Direct impacts

9.52 The inclusion of policy that explicitly requires infrastructure provision in association with development, to serve new housing and the residents of the homes, is identified as having a number of significant positive effects, most notably measured against SA objectives 2 - Community services, 3 - Education and skills, 4 – Health, 7 Leisure and recreation, 12 - Sustainable transport, 14 - Greenhouse gas emissions and 16 - Energy efficiency. New infrastructure provision, sought by plan policy, is directly related to the positive sustainability outcomes that are established as SA objectives. Further to these significant positive impacts there are also a series of minor positives imp[acts identified, these are for SA objectives 5 – Crime, 10 – Amenity, 11 – Biodiversity, 19 - Town Vitality & viability and 20 - Inward investment. In respect of these SA objectives the policy provision in the plan is less explicitly clear cut in terms of provision but the expectation would be of positive impacts. In respect of SA objective 9 – landscape character a minor negative, though qualified as uncertain, is recorded. Development may have adverse impacts on the landscape and this can be especially so with larger scale developments. Any development that is larger scales, specifically if mitigation measures are not in place, could result in possible negative impacts.

9.53 The alternative option of not having policy introduces a number of uncertainties into the plan. So although the headline SA scores are not changed, compared against having the policy, there are now question marks placed against the positive results on account of the unknown nature of impacts, and specifically whether infrastructure will actually be secured.

Secondary, cumulative and synergistic impacts

9.54 There can be expectations for a range of positive secondary, cumulative and synergistic impacts through ensure positive timely infrastructure provision. Having good qualities facilities should enhance quality of life and opportunities for Cranbrook residents, hence the positive ‘knock-on’ impacts. However, it is noted that there are limitations, in viability terms, of infrastructure that might be affordable.

Permanence and Timescale of impacts

9.55 The impacts of positive infrastructure provision can be expected to be permanent in nature and early provision should ensure benefits are achieved early on.

Scope for Mitigation

9.56 In respect of SA Objective 9 – landscape character it is noted that adverse impacts could arise. However, with mitigation adverse impacts may be mitigated against and there are references in the plan to landscape impacts considerations that would be taken into account in determination of applications.

Table 9.7 - SA appraisal of Policy CB6 - Cranbrook Infrastructure Delivery

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
To include policy CB6 that requires infrastructure provision	0	++	++	++	+	0	++	0	- ?	+	+ ?	++	0	++	0	++	0	0	+	+
To **not** have a policy for infrastructure provision.	0	++ ?	++ ?	++ ?	+?	0	++ ?	0	- ?	+?	+ ?	++ ?	0	++ ?	0	++ ?	0	0	+?	+?

Policy CB7 - Design - Phasing

9.57 Policy CB7 is identified to be more about process matters, requiring phasing plans to accompany planning applications, rather than an actual policy approach to the issues.

9.58 The policy is specifically concerned with the allocated sites in policies CB2 to CB5 and in summary requires:

- demonstration of how social, community and physical facilities and infrastructure as well as employment land and premises will be delivered alongside or ahead of new housing;
- central parcels of land, close to or adjoining, community and education facilities to be developed first and those further away later;
- undergrounding of electricity cables;
- delivery of schools.

Alternative Options

9.59 As an alternative to this approach is to not have a phasing strategy.

Direct impacts

9.60 The provision of facilities, as the phasing policy seeks to ensure, is identified as having significant positive impacts in respect of the SA objectives of 2 - Community services and 3 - Education and skills as these are specific facilities that policy requires provision of. Policy is also identified as having positive benefits in respect of SA objectives 4 – health and 7 – leisure and recreation as there are also facility linkages here. In contrast under the approach of not having policy there are uncertainties identified. Facilities might come forward and plan policy elsewhere sets out requirements. However the timing for delivery is unclear and if provision slips towards the end of development there is the danger it may not happen, or at least the positive benefits will be delayed in taking affect.

Secondary, cumulative and synergistic impacts

9.61 The assessment table underplays the positive potential secondary, cumulative and synergistic impacts that the implementation of policy may be expected to have. Timely phasing of development, especially if this provides early facility provision, should have wide ranging positive ‘knock-on- impacts.

Permanence and Timescale of impacts

9.62 Development undertaken can typically be taken as permanent and therefore the impacts of phasing policy would also be so.

Scope for Mitigation

9.63 No negative impacts are identified so mitigation potential is not identified.

Table 9.8 – SA Testing of CB7 - Design - Phasing

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy CB9 is specifically concerned with the allocated sites in policies CB2 to CB5 and in summary requires: • demonstration of how social, community and physical facilities and infrastructure as well as employment land and premises will be delivered alongside or ahead of new housing; • central parcels of land, close to or adjoining, community and education facilities to be developed first and those further away later; • undergrounding of electricity cables; • delivery of schools.	0	++	++	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
As an alternative to this approach an option of not building flexibility in to the design and construction of buildings could be applied.	0	?	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Policy CB8 - Cranbrook and Broadclyst Station Built-up Area Boundaries

9.64 The policy provides a Built-up Area Boundary around Cranbrook and also one around the Broadclyst station area. The alignment of the boundary, land within the boundary, shows areas where subject to policy requirements (and wider policies of the plan) development will be acceptable. Outside of the boundary development constraints apply. For the most part the boundary aligns with areas of land allocated for development in the Cranbrook plan but also includes areas built to date and some outlying and surrounding areas that are already developed (this is particularly so for the Broadclyst station area).

Alternative Options

9.65 The boundary lines are drawn comparatively tightly around existing and planned development and allow potential for limited infill development but they do not provide additional land or scope for further outward build Cranbrook expansion. To inform the SA work there are two alternatives to the policy approach that area assessed, these are;

- To not have boundaries and instead rely on land allocations to determine appropriate areas for development.
- To drawn boundaries that encompass undeveloped land around the outside of Cranbrook (into non-allocated areas) and therefore provide a basis for further outward expansion of the new town. The impacts of this policy approach would, in effect and in most cases, be one of accommodating more development on the fringes of Cranbrook. Assessment is based on potential impacts of development on this basis.

9.66 In respect of the second option, above, it is highlighted that specific sites or land area options that could fall in an extended boundary have not been identified. Assessment and commentary is, therefore provided on a generic level only. However, the next chapter of this appraisal does assess the potential in-principle suitability for development of land areas at and around Cranbrook.

Direct impacts

9.67 There are few direct impacts identified against the SA objectives in respect of defining boundaries. Where minor positive impacts are noted they are in respect of objectives relating to environmental protection considerations, specifically SA objectives 8 - Historic environment, 9 - Landscape character and 11 Biodiversity. These conclusion are drawn because the process of boundary definition will have taken into account sensitive features and locations in defining boundaries.

9.68 If boundaries are not defined the onus would rest on allocations being the means to bring forward and allow for development, but there could remain policy ambiguity in respect of land at the edges of Cranbrook that is not allocated but on which it may be deemed potentially appropriate to allow for development. A number of infill proposals that could be of this nature have come forward at/around Cranbrook in the past. The option of not having Built-up Area Boundaries sees the same conclusions against the SA objectives as having boundaries albeit on account of the uncertainties generated question marks are added. Furthermore the Built-up Area Boundaries exclude some areas of land that are allocated in the plan, but with specific allocated uses being for recreation or other open

space development types. If the boundaries did not exist then these areas could have less clarity in respect of their 'protection' from built development.

9.69 In the SA table the minor positives of boundary definition are recorded as minor negatives albeit with question marks denoting uncertainty attached. The boundaries to outward development at Cranbrook have been informed, in a number of locations, by detailed assessment work, especially so in respect of potential landscape impacts. Expanded boundaries could allow for development, therefore, on land areas of environmental sensitivity. However there is a minor positive associated with expanded boundaries in respect of SA objective 1 for housing as an expectation of enlarged boundaries could be more housing development.

Secondary, cumulative and synergistic impacts

9.70 There are no specific secondary, cumulative and synergistic impacts noted in respect of impacts.

Permanence and Timescale of impacts

9.71 Development arising, which the boundaries will help determine acceptability of, can be taken to be permanent in nature.

Scope for Mitigation

9.72 Specific mitigation is not identified but suffice to note that boundary definition needs to be based around logical assessment processes.

Table 9.9 - SA appraisal of Policy CB8 - Cranbrook and Broadclyst Station Built-up Area Boundaries

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
To apply the boundaries as shown in the Cranbrook Plan	0	0	0	0	0	0	0	+	+	0	+	0	0	0	0	0	0	0	0	0
To not have boundaries and instead rely on allocations only	0	0	0	0	0	0	0	+?	+?	0	+?	0	0	0	0	0	0	0	0	0
To have far more loosely defined boundaries that would allow for greater outward expansion of Cranbrook	+	0	0	0	0	0	0	-?	-?	0	-?	0	0	0	0	0	0	0	0	0

Policy CB9 - Public Transport Enhancement

9.73 Policy CB9 seeks better public transport at Cranbrook through enhanced rail services, with development contributing to provision, and through improved bus services running on primary routes.

Alternative Options

9.74 The alternative identified in appraisal to enhanced public transport services is to not enhance services. In the appraisal table the assumption is that things would, therefore, stay as they are. A third option that has not been formally appraised would be to actively (or passively) encourage or facilitate worse public transport. This option was not considered a credible option but if it were assessed it could be expected to have the directly opposite impacts as the approach of improving public transport, significant positives might be expected to become significant negatives and minor positives become minor negatives.

9.75 There could be other variations on the policy approach that have not been appraised, but it is noted that they exist. For example there would potential be an option of enhancing bus services without improving rail services or to enhance rail but not bus services, there could also be variations on these. Whilst not formally appraised enhanced rail services could be expected to be of greater benefit to those that are closer to or with easiest access to the station or stations. Whereas enhanced bus services may achieve, to some degree, a wider geographic spread of benefits.

Direct impacts

9.76 This policy approach of enhancing public transport is identified as having significant positive benefits when assessed against SA objectives 2 - Community services, 12 - Sustainable transport and 14 Greenhouse gas emissions. The first of these is on account of improved accessibility to facilities and the second and third reflect to fact that public transport will be enhanced and it is more fuel efficient than private transport. There are a series of minor positive impacts also identified in respect of improved public transport, these include for SA objectives 3 - Education and skills, 4 – Health, 7 Leisure and recreation, 16 Energy efficiency, 18 - Employment, 19 - Town Vitality & viability and 20 - Inward investment. These positive outcomes are largely based on ability of people to access facilities that improved public transport should bring about. But they also include the fact, for health, enhanced public transport, versus the car, will encourage people to walk more, public transport is more beneficial than private transport is energy use terms and for the SA economy objectives public transport should promote positive economic growth prospects, including in respect of the town centre and public transport services focusing on town centre locations.

9.77 In contrast not having public transport improvements would lead to a number of the significant or minor positives instead being negligible in outcome. Minor negative impacts (or these potentially could become significant negative impacts) are identified in respect of the SA objectives of 12 Sustainable transport, 14 Greenhouse gas emissions and 16 Energy efficiency. Without improved public transport a greater expectation and reliance would fall to the private car, hence the specific negative impacts identified. In respect of

noise, for both increased public transport and also not increasing, there is some uncertainty identified, hence the question mark. Public transport can be noisy, especially trains, and therefore there could be adverse impacts for those living or going to schools or work at or close to routes. However, cars, particularly on busy roads, can also generate noise pollution. The precise nature and scale of impact would, however, depend on such issues as proximity and would be affected by specific, unknown, design considerations (albeit masterplanning work does not show houses that close to the railway line).

Secondary, cumulative and synergistic impacts

9.78 There can be expectations of secondary, cumulative and synergistic impacts associated with improved public transport provision. Public transport works best and is most appealing when services are good (both in terms of reliability and frequency) and whilst over-crowding can be a negative impact public transport is most efficient when patronage levels are high. On this basis improved public transport can be expected to complement and add to the positives identified.

Permanence and Timescale of impacts

9.79 The benefits of public transport can be hoped to be permanent, albeit if dependent on subsidies, and subsidies are cut, then the permanence may be called into question. It is seen as desirable to establish good public transport early on in any scheme development as this may help establish patterns of public transport patronage as opposed to people choosing to use private vehicles.

Scope for Mitigation

9.80 There are no specific negatives noted in respect of public transport provision though the issues of noise, SA objective 5, raises some uncertainties of impact and mitigation through design work would be appropriate.

Table 9.10 - SA appraisal of Policy CB9 - Public Transport Enhancement

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
To apply policy CB7 and secure enhanced public transport services.	0	++	+	+	0	?	+	0	0	0	0	++	0	++	0	+	0	+	+	+
To **not** have enhanced public transport services.	0	0	0	0	0	-?	0	0	0	0	0	-	0	-	0	-	0	0	0	0

Policy CB10 - Safeguarding Land for a Second Station

9.81 Policy CB10 provides for safeguard land for the delivery of a second railway station at Cranbrook. The policy does not explicitly say that a new station will or must be provided, what it does do is resist other developments that prejudice the potential to provide a station at a later date. Appraisal is undertaken, however, on assumption that there will be station provision.

Alternative Options

9.82 The alternative is identified as not planning for and not having a second railway station.

Direct impacts

9.83 The provision of a second station is seen as offering a significant positive benefit is respect of SA Objective 12 sustainable transport as it should greatly encourage people to use the train service. A positive, thorough encouraging train use, is also identified against SA Objective 14. In contrast, however, any new major infrastructure work, as station provision would result in could have negative landscape impacts, SA Objective 9, whilst there may be possibility for wider negative environmental or pollution impacts.

9.84 In respect of not planning for a second station a full row of negligible scores are recorded as this approach would retain the status quo. However, some of the negligible scores could have unknowns or positives attached against them. If land is retained for potential station development then it could stop other positive uses or development of land from coming forward. Under the second option of not safeguarding the land it could be that there would actually be some positive benefits by allowing for alternative (or an actual) positive development of the land.

Secondary, cumulative and synergistic impacts

9.85 It could be expected that that should a second station go ahead there would be a range of potential secondary, cumulative and synergistic impacts. For example positive benefits may come through in respect of SA objective 4 health by encouraging people to walk to catch trains (rather than just jumping in a car).

Permanence and Timescale of impacts

9.86 Any impacts would be expected to be permanent in nature.

Scope for Mitigation

9.87 Landscape impacts, in particular, could be of some significance and so would warrant careful consideration in any scheme that is promoted.

Table 9.11 - SA appraisal of CB10 - Safeguard land for a second railway station

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy provides for safeguard land for the delivery of a second railway station	0	0	0	0	0	0	0	0	-?	0	0	++	+	+	0	0	0	0	0	0
The alternative is identified as not planning for and not having a second railway station	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Policy CB11 - Cranbrook Affordable Housing

9.88 The policy expectation is for 15% of dwellings built to be affordable housing. This level of provision has been informed by viability testing that took into account values associated from overall development and costs associated with physical and social infrastructure. The 15% level was determined to be an upper commercially viable level of provision given other expectation for Cranbrook and specifically broader associated costs.

Alternative Options

9.89 The alternative option to providing 15% affordable housing are identified as:

- Providing greater levels of affordable housing, albeit with assumption that there would need to be lower levels of provision of other facilities.
- Provide lower levels of affordable housing.

Direct impacts

9.90 In the SA appraisal table it is recorded that provision of 15% affordable housing would provide minor positive sustainability impacts in respect of 1 Housing, 2 Community services, 3 Education and skills, 4 Health and 7 Leisure and recreation. These minor positive reflect that fact that affordable housing is a positive and needed requirement and as policy levels set out it will allow for other community facilities, directly linked to the SA objectives, to be provided. As a caveat it could be that minor positives might, arguably, be closer to significant positives, but this may depend on the sensitivities of viability of provision, and indeed if they are actually delivered.

9.91 The option of providing higher levels of affordable housing generates a significant positive against SA objective 1 for housing. This scoring is premised on assumption that securing affordable housing is of more importance than 'just' open market housing. However, it is assumed in assessment that higher affordable housing provision would lead to lower other facilities provision, hence the minor negatives recorded against SA objectives of 1 Housing, 2 Community services, 3 Education and skills, 4 Health and 7 Leisure and recreation. It could also have been the case that wider negative SA impacts could have been recorded as well if other services, facilities and items of infrastructure (perhaps more so physical rather than social) were not provided. For appraisal purposes the impacts of providing lower levels of affordable housing are recorded as being the same as providing at 15%, with the exception of SA objective 1 for housing that shows a significant negative impact on account of lowering levels of affordable housing that will be provided.

Secondary, cumulative and synergistic impacts

9.92 There could be potential for a range of secondary, cumulative and synergistic impacts that arise from provision of affordable housing that could relate to such issues as health, quality of housing having a strong impact on health as well as such matters of ability for people to be near to jobs and facilities and the positive impacts that can arise.

Permanence and Timescale of impacts

9.93 Affordable housing can be looked upon as a permanent form of housing provision though with there being existing need timely provision is desirable.

Scope for Mitigation

9.94 No specific scope for mitigation is noted.

Table 9.12 - SA appraisal of CB11 - Cranbrook Affordable Housing

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
To provide 15% affordable housing	+	+	+	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
To provide higher levels of affordable housing	++	-	-	-	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0
To provide lower levels of affordable housing	--	+	+	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0

Policy CB12 - Cranbrook Custom and Self-build housing

9.95 The policy expectation is that in the land allocations coming under policies CB2 to CB5 a minimum of 4% of dwellings built will be custom or self-built.

Alternative Options

9.96 The alternative to having the policy is identified as not having a policy requirement.

Direct impacts

9.97 The most significant impact of inclusion of a self-build policy comes in respect of SA objective 1 for housing. Self-build housing can be expected to increase choice and variety of housing and also self-builders can hope to pay less for the end product. For such reasons the policy see a significant positive impact measured against SA objective 1. Minor positive impacts are also noted against SA objectives 18 Employment and 20 Inward investment as self-builders are likely to source labour and materials from local sources and suppliers and therefore have greater local positive economic impacts. In contrast not having a policy and therefore rely on non-self-build routes, especially housing built by national housebuilders, is not seen as having the same local economic impacts, hence the negligible sores. Of more importance, however, is the minor negative impact identified for a non-self-build policy for SA objective 1 as it would reduce available choice and variety.

Secondary, cumulative and synergistic impacts

9.98 Self-building can have a significant number of positive secondary, cumulative and synergistic impacts. Increase choice and variety of housing should lead to a more attractive end form for Cranbrook and self-builders tend to occupy their homes for longer than those than those not self-building. They could lead to a more stable linger term population for Cranbrook.

Permanence and Timescale of impacts

9.99 Self-build homes should be seen as permanent in nature.

Scope for Mitigation

9.100 No mitigation is seen as necessary.

Table 9.13 - SA appraisal of CB12 - Cranbrook Custom and Self-build housing

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Including a self-build policy.	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+
Not Including a self-build policy.	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Policy CB13 - Delivering Zero Carbon

9.101 The policy expectation is set out around measures and approaches that seek to deliver zero carbon objectives. It seeks to achieve this through measures to:

- Minimise the need to travel;
- Minimise energy demand and carbon emissions
- Maximise the proportion of energy from renewable or low carbon sources
- Ensure buildings are operated efficiently.

9.102 The policy is appraised in the context of the above considerations.

Alternative Options

9.103 The alternative identified is not to have the policy.

Direct impacts

9.104 The application of policy is identified as having significant positive impacts in respect of three key objectives, namely 12 - Sustainable transport, 14 - Greenhouse gas emissions and 16 - Energy efficiency. These are all concerned with matters that go to the core of policy intent. The policy does, as well also achieve a number of minor positive impacts, these are 1 - Housing as application of policy should provide better places for people to live, 4 -Health as better house and also encouraging walking will support health, 17 Waste as policy should see reduced waste levels and two economic objectives of 18 – employment and - 20 Inward investment as policy should promote economic growth and job prospects. With respect to SA objective 9 – landscape character a minor negative is identified as infrastructure related to secure policy could have adverse landscape impacts.

9.105 The alternative to not having the policy would see mostly negligible impacts though minor negatives, on account of not taking advantage of opportunities and also not planning for the benefits are identified in respect of SA objectives 12 - Sustainable transport, 14 - Greenhouse gas emissions and 16 - Energy efficiency.

Secondary, cumulative and synergistic impacts

9.106 Positive knock-on impacts can be expected through application of policy that cut across the SA objective themes. For example a population that walks more can be expected to be more active in leisure activities, SA objective 7 and technically efficient heating systems, applied to community buildings, may aid economic efficiency.

Permanence and Timescale of impacts

9.107 Impacts can be expected to be permanent in nature.

Scope for Mitigation

9.108 Mitigation measures may be appropriate in respect of potential for adverse landscape impacts.

Table 9.14 - SA appraisal of CB13 - Delivering Zero Carbon

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Zero carbon policy to: • Minimise the need to travel; • Minimise energy demand and carbon emissions • Maximise the proportion of energy from renewable or low carbon sources • Ensure buildings are operated efficiently.	+	0	0	+	0	0	0	0	-	0	0	++	0	++	0	++	+	+	0	+
Not have the policy	0	0	0	0	0	0	0	0	0	0	0	-	0	-	0	-	0	0	0	0

Policy CB14 - Safeguarding of land for Energy Centre

9.109 Policy CB14 advises of safeguarding land for the expansion of the district heating Energy Centre. In this context it should be noted that heating to houses in Cranbrook is currently provided through a District Heating System and this would offer scope for expansion. The safeguarded/allocated land is located next to the existing plant. Assessment of policy is based on assumption that a plan will be built.

Alternative Options

9.110 As an alternative to safeguarding or allocating land is the option of not safeguarding land - under this option the assumption is made that district heating would not extend to new development. It should be noted that assessment has not been undertaken of alternative site options for new plant or other means to supplies the heating system.

Direct impacts

9.111 There are two significant direct positive impacts associated with the option of District heating, these are in respect of SA objectives - 14 greenhouse gas emissions and 16 energy efficiency, though it is noted that these are specifically relevant only if the plant is working to maximum efficiency and using waste material or bio-mass as fuel. SA objective 17 for waste is identified as seeing a positive effect. The reducing greenhouse gas emissions consideration is particularly significant as the plan should produce heating with low net CO_2 emission levels. A possible significant negative impact is potentially identified in respect of landscape objectives. The plant could be physically quite large, hence potential for some landscape impacts, but it is set on the edge of an industrial landscape and next to the airport.

9.112 In respect of not making provision for the plant there are a series of question marks against corresponding SA objectives, as well as a range of negligible scores. The question marks reflect the uncertainty of impacts that an unspecified alternative source of heating might create or generate.

Secondary, cumulative and synergistic impacts

9.113 No specific secondary, cumulative and synergistic impacts are identified.

Permanence and Timescale of impacts

9.114 Provision should be seen as permanent, as should impacts, and it will be essential for heating capacity and outputs to be in place and operational in line with or ahead of houses and other forms of development being built.

Scope for Mitigation

9.115 There may be a need for care to be taken in design matters with respect for potential for adverse landscape impacts. Though there could perhaps be potential for a bold a striking design in a semi industrialised area.

Table 9.15 - SA appraisal of Policy CB14 - Safeguarding of Land for Energy Centre

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
The proposed policy advises of the appropriateness to Safeguard/Allocate land for the expansion of the district heating Energy Centre.	0	0	0	0	0	0	0	0	-	0	0	0	0	++	0	++	+	0	0	0
As an alternative to safeguarding or allocating land is the option of not safeguarding land - under this option the assumption is made that district heating would not extend to new development.	0	0	0	0	0	0	0	0	?	0	0	0	0	?	0	?	0	0	0	0

Policy CB15 - Delivery of Suitable Alternative Natural Green Space (SANGS)

9.116 The policy expectation is that SANGS will be delivered in close proximity to Cranbrook in accordance with detailed standards.

Alternative Options

9.117 The alternative identified approach is provide SANGS away from Cranbrook. The option of not providing SANGS has been rejected from appraisal as failure to provide would run counter to the established mitigation strategy and Habitat Regulation considerations.

Direct impacts

9.118 Provision of SANGS at or close to Cranbrook is identified as having significant positive impacts in respect of two SA objectives 4 – Health and 7 - Leisure and recreation. SANGS, whilst explicitly designed to mitigate impacts arising at European designated wildlife sites will offer additional recreation opportunities, specifically access to countryside, at Cranbrook. In so doing they should support health outcomes and also benefit leisure and recreation opportunities. A minor positive impact is identified as well in respect of reducing greenhouse gas emissions, SA Objective 14, on account of reducing the distance people may travel to access open space areas for recreation. Where uncertainty is identified is in respect of SA objectives 9 - Landscape character and 11 – Biodiversity. Land to be used for SANGS is currently mostly undeveloped farmland, some of landscape quality and any reuse or opening up for more recreation with associated access facilities and paths could potentially, if badly done, result in adverse impacts. It may also be that recreational uses, perhaps quite intense with lots of dogs, could have adverse impacts on wildlife.

9.119 In respect to the potential for providing SANGs away from Cranbrook there are still identified benefits, though because of proximity and therefore accessibility, there are only minor positive benefits in respect of SA objectives 4 – Health and 7 - Leisure and recreation. The uncertain impact concerns remain in respect of SA objectives 9 - Landscape character and 11 – Biodiversity, but a minor negative impact is identified in respect of SA objective 14 for greenhouse gas emissions as people are more likely to drive to access the SANGS.

Secondary, cumulative and synergistic impacts

9.120 Specific secondary impacts are not identified.

Permanence and Timescale of impacts

9.121 SANGS provision and hence the positive impacts arising should be seen as permanent.

Scope for Mitigation

9.122 Care will be appropriate in respect of mitigation or designing out potential for possible adverse landscape or biodiversity impacts.

Table 9.16 - SA appraisal of CB15 - Delivery of Suitable Alternative Natural Green Space (SANGS)

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Provide SANGS at and close to Cranbrook	0	0	0	++	0	0	++	0	?	0	?	0	0	+	0	0	0	0	0	0
Provide SANGS in a location away from Cranbrook	0	0	0	+	0	0	+	0	?	0	?	0	0	-	0	0	0	0	0	0

Policy CB16 - Design Codes and Place Making

9.123 There is a policy reference to production of design codes for policy areas CB2 to CB5 and also use of Building for Life 12 principles (as adapted).

Alternative Options

9.124 The alternative is to not have a policy reference.

Direct impacts

9.125 The direct impacts associated with this policy are minor positives (though arguably they could be significant positives) in respect of the following SA objectives; 1 - Housing, 2 - Community services, 8 - Historic environment, 9 Landscape character, 10 – Amenity and 12 Sustainable transport. Policy directly cross-references to these matters and this accounts for the direct positive impacts identified. In the absence of policy it is not clear or less clear whether positive outcomes will be achieved (though noting that other policies in the plan also cover some of the area highlighted). The questions marks in the table highlight the uncertainties.

Secondary, cumulative and synergistic impacts

9.126 There can be expectations of a number of secondary, cumulative and synergistic impacts through implementation of policy. For example by supporting high quality living environments that can be expectations that people should be healthier, not the least because they will walk more, SA objective 4 addresses health. The links would also apply to positive outcomes in respect of SA objective 7 for Leisure and recreation.

Permanence and Timescale of impacts

9.127 Impacts can be expected to be permanent.

Scope for Mitigation

9.128 No need for mitigation, given no negative impacts, is identified.

Table 9.17 - SA appraisal of Policy CB16 - Design Codes and Place Making

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
To include policy for design codes and building for life principles.	+	+	0	0	0	0	0	+	+	+	0	+	0	0	0	0	0	0	0	0
To not include the policy.	?	?	0	0	0	0	0	?	?	?	0	?	0	0	0	0	0	0	0	0

Policy CB17 - Amenity of Future Occupiers

9.129 The policy expectation is of space standards and amenity standards.

Alternative Options

9.130 The identified alternative is to not have amenity standards in policy.

Direct impacts

9.131 Two significant positive impacts are identified against SA objectives 1 - Housing, 4 – health and 6 – noise. The first and the last are matters that policy explicitly refer to, an expected outcome through implementation of policy for residents of dwellings would be better health standards. Under the option of not having a policy these three SA objectives see uncertain question mark responses as it is not clear whether any standards or levels would be applied. If they were not the uncertain conclusions could be replaced by minor negative or at their worst potentially significant negative impacts.

Secondary, cumulative and synergistic impacts

9.132 With people living in better quality homes, specifically including as a result of being healthier, there can be expectations of secondary, cumulative and synergistic impacts. For example healthier people are likely to better able to work and hence economic benefits may arise and they could also be expected to make more use of and support services and facilities.

Permanence and Timescale of impacts

9.133 The impacts of better standards can be assumed to be permanent.

Scope for Mitigation

9.134 No specific mitigation is seen as necessary.

Table 9.18 - SA appraisal of Policy CB17 - Amenity of Future Occupiers

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Include policy with amenity standards as set out.	++	0	0	++	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0
To not have standards	?	0	0	?	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Policy CB18 - Digital Connectivity

9.135 The policy advises that all developments proposing new dwellings or employment space must ensure fixed and mobile gigabit-capable digital connectivity is provided throughout. An expectation of policy is inclusion of ducting in development to allow multiple cables to be laid.

Alternative Options

9.136 The alternative option is to not require digital connectivity. Under this option the assumption is that providers will take a view on what connections they may want to provide.

Direct impacts

9.137 The most important impacts identified for the policy are in respect of significant positive impacts in respect of SA objectives 1 - Housing, 18 - Employment and 20 - Inward investment. Policy is designed around and intend to be supportive of home living environments and business, with reasoned justification stressing the increasing importance of digital connectivity, hence the conclusions drawn. With some much entertainment being internet based SA objective 7 – Leisure and recreation see a minor positive impact. However the impacts of policy on SA objectives 12 - Sustainable transport and 19 Town Vitality & viability are far from clear hence the question marks that are recorded. With increasing online purchasing and consumption many town centres, specifically the retail functions and elements, are struggling to survive and with improved digital connectivity it may further threaten the viability of town centre provision. Also linked to greater on-line shopping is that more goods will be delivered to people at home, thus potentially reducing need for travel (including sustainable travel) but perhaps of more importance is an increase in home delivery vehicles and the potential adverse impacts they could increasingly have.

9.138 The challenge of appraising not having a policy is the unknowns that arise as a result. Market forces are such that some sort of internet connectivity can be expected to be available for every new commercial and residential property, however how good this may be and what sort of choices may be available are unknowns. The unknowns are reflected in the question marks sores recorded in the appraisal table.

Secondary, cumulative and synergistic impacts

9.139 Good quality internet connectivity can be expected to have a range of positive secondary and cumulative impacts. For example with increasing internet connections people can be expected to be better informed and better connected, which may mean the access to health care or community services may improve. Though the possible adverse impact is people maybe not going out as much, as services, goods and entertainment are delivered increasingly over the internet.

Permanence and Timescale of impacts

9.140 One of the potential key benefits of policy is that it should reduce the need or pressure to dig up roads and other areas to lay extra cable over time. The benefits include eradication (or much reduced) disruption that excavation can cause and also cost implications of any

multiple digging. It would be assumed, therefore, that impacts of policy should be permanent in nature.

Scope for Mitigation

9.141 There is no specific mitigation identified in respect of policy though wider town centre viability matters are noted.

Table 9.19 - SA appraisal of Policy CB18 – Digital Connectivity

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy compliant expectation of digital connectivity	++	0	0	0	0	0	+	0	0	0	0	?	0	0	0	0	0	++	?	++
To not require digital connectivity in new development	?	0	0	0	0	0	?	0	0	0	0	?	0	0	0	0	0	?	?	?

Policy CB19 - Coordinated Sustainable Travel

9.142 The policy expectation is coordinated accessible and alternative (non-car) means of transport which help deliver sustainability and health related benefits with a specific requirement for travel plans and shared cars and electric vehicles – specifically with docking standards.

Alternative Options

9.143 The identified alternative is to not have such standards and instead not pursue a policy of encouraging greater use and provision of electric vehicles.

Direct impacts

9.144 The greatest impact in respect of inclusion of the policy arise in respect of SA objectives 12 - Sustainable transport and 14 - Greenhouse gas emissions for which significant positive impacts are noted. The policy and these two objectives are closely aligned, hence the expectations of results identified. In this context a minor positive impact is also noted against SA objective 16 with greater energy efficiency is achieved (electric cars are more energy efficient that internal combustion engines).

9.145 Sustainable travel and therefore encouraging people to be active would also be expected as having minor positive health impacts in respect of SA objective 4, electric vehicles will be less noisy than internal; combustion engines, SA objectives 6 and 10 and also, electric bikes in particular, can be an accessible form and encourage leisure and recreation, SA objective 7. A question mark denoting uncertainty, is, however, logged against SA 5 for crime as perhaps there is uncertainty over security considerations?

9.146 In contrast to actively pursuing the sustainable transport options would be a policy approach that was neutral to them (or as a more extreme, whether by design or default, discouraged them). As set out in the appraisal table there are three minor negative impacts identified with this approach. These are 4 - Health, 12 - Sustainable transport and 14 - Greenhouse gas emissions. An expectation would be that people would be less active under the policy approach, hence the health considerations and also sustainable modes of travel would not be pursued hence the negative impacts against SA objectives 12 and 14.

Secondary, cumulative and synergistic impacts

9.147 The benefits of sustainable travel are geared around making a more liveable and attractive environment. Positive wide ranging secondary impacts can be an expected outcome.

Permanence and Timescale of impacts

9.148 Impacts can be expected to be permanent and to some degree pre-empt a movement to electric vehicles that will happen at a national level anyway.

Scope for Mitigation

9.149 Security measure associated with possible crime considerations, SA objective - 5, would, in due course, warrant attention.

Table 9.20 - SA appraisal of Policy CB19 – Coordinated sustainable travel

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
To include policy for travel plans and shared cars and electric vehicles	0	0	0	+	?	+	+	0	0	+	0	++	0	++	0	+	0	0	0	0
To not have policy and not promote electric vehicle use.	0	0	0	-	0	0	0	0	0	0	0	-	0	-	0	0	0	0	0	0

Policy CB20 - Plug-In and Ultra Low Emission Vehicle Charging

9.150 The Policy provision advises that there should be electric car charging points for all residential dwellings and provision within public parking areas and within business car parks. For appraisal purposes it is assumed that people would use charging points and it would encourage use of electric cars

Alternative Options

9.151 The alternative option is seen as not providing/not requiring dedicated charging points. The implication being that provision should be at the choice of the developer or consumer. For the benefit of the appraisal, and to allow one approach to be compared against another it is assumed that under this approach there would not be charging points.

Direct impacts

9.152 There are small number of direct positive impacts identified as associated with this policy approach, with an assumption that it would increase use of electric vehicles, especially cars and reduce use of petrol and diesel vehicles. It should be noted that in this assessment none of the positive impacts are identified as significant, but the positives are identified in respect of SA objectives 6) noise (electric cars are less noisy than internal combustion engines), 12) sustainable transport, 13) air soil and water quality (but air in particular given gaseous emissions that would otherwise arise), 14) greenhouse gas emissions and 16) energy efficiency. The option of not having/not promoting electric vehicle and instead assuming retained reliance on internal combustion engines, scores negatives against all these indicators.

Secondary, cumulative and synergistic impacts

9.153 There could be a range of secondary, cumulative and synergistic impacts that may arise as a consequence of this policy approach. If charging points encourage or allow people to become more mobile, specifically to travel more in electric vehicles than they might have done or do in internal combustion engine vehicles, there could be community benefits associated with people getting out more and also in potentially making for a cleaner environment there could be ‘knock on’ economic benefits for example, In respect of making Cranbrook a more attractive place to do business. Conversely, however, if charging points actually encourage people to drive more, and for example walk less, there could be adverse impacts, for example on health..

Permanence and Timescale of impacts

9.154 There is an expectation in a long term trend to electric car use so impacts should be seen as permanent.

Scope for Mitigation

9.155 Whilst implementation may typically have minor cost implications as these are not considered to be great there are no specific mitigation measures identified as needed.

Table 9.21 - SA appraisal of Policy CB20 - Plug-In and Ultra low Emission vehicle charging

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
There should be electric car charging points for all residential dwellings and provision within public parking areas and within business car parks.	0	0	0	0	0	+	0	0	0	0	0	+	+	+	0	+	0	0	0	0
The alternative option is seen as not providing/not requiring dedicated charging points (assumed for appraisal that there would not be provision).	0	0	0	0	0	-	0	0	0	0	0	-	-	-	0	-	0	0	0	0

Policy CB21 - Parking at Cranbrook

9.156 Policy provision is made for car parking standards at Cranbrook to address overall numbers of parking space per dwellings/development as well as space size standards. Provision is also made for bicycle parking.

Alternative Options

9.157 The alternative option is identified as not providing minimum standards.

Direct impacts

9.158 The policy is clearly established to make parking more affective and accessible to residents of and visitors to/users of Cranbrook. A concerns, as reflected in assessment, is that if this results in more people driving cars and greater car reliance and dependency then this could result in adverse impacts against a number of SA objectives. On account of greater car dependency leading for potential for adverse impacts, but by no means that this is a certainty, minor negative impacts with an uncertainty question mark are identified against SA objectives 4 – Health, on account of discouraging physical activity, and 12 - sustainable transport and 14 - greenhouse gas emissions on account of their potentially being greater car use. A minor positive is identified in in respect of SA objective 10 for amenity, as policy should support better streets and also for 1 for housing, though with a question mark, as it is hoped it would make better homes for people.

9.159 It should be noted that the above comments are made within the context of parking considerations and cars. Taking the bicycle element of policy on a standalone basis would see positives against the SA objectives. The option of not having policy sees a spread of negligible impacts though in respect of 10 – amenity a negative impact is identified. There are already some concerns that inappropriate and in some cases inadequate parking in some parts of Cranbrook already exists and a concern, therefore, that if current patterns are replicated then similar problems could manifest themselves in the future.

Secondary, cumulative and synergistic impacts

9.160 No specific impacts are identified.

Permanence and Timescale of impacts

9.161 Parking and cycle provision should be seen as permanent.

Scope for Mitigation

9.162 It would be appropriate to consider application of policy in the context of avoid an outcome of greater car dependency.

Table 9.22 - SA appraisal of Policy CB21 - Parking at Cranbrook

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy provision is made for minimum parking space sizes.	+?	0	0	-?	0	0	0	0	0	+	0	-?	0	-?	0	0	0	0	0	0
The alternative option is identified as not providing minimum standards.	0	0	0	0	0	0	0	0	0	-	0	0	0	0	0	0	0	0	0	0

Policy CB22 - Cranbrook Town Centre

9.163 The CB22 policy expectation to ensure the delivery of an economically successful town centre and one that meets its aspirations as being the focus of a healthy New Town, policy provides a town centre boundary and will support and make provision for the delivery of:

- most of its own retail, commercial, economic and social needs – in a high quality environment where people will meet,
- a multi-purpose market square – to host markets, be a social space and be of high quality;
- a health & wellbeing hub
- a leisure centre;
- Civic centre (Town Council Offices);
- Library;
- Children's centre;
- Youth centre;
- Extra care housing;
- Retail uses
- Temporary commercial uses.

Alternative Options

9.164 The alternative identified to not have a policy for the town centre and instead to respond to planning applications that may come in on am ad-hoc or non-policy informed basis.

Direct impacts

9.165 Having a vibrant town centre is identified as a critical component for the future success of Cranbrook. Under plan policy a number of significant positive impacts are identified, these are 4 - Health, 7 - Leisure and recreation, 18 Employment and 19 Town Vitality & viability. Specific facilities are planned for the centre, hence the significant positives in respect of health, leisure and recreation whilst two of the economic development objectives, on account of the importance of the commercial role of the centre achieve significant positives. More generally there are also a number of minor positives noted under policy, specifically in respect of 1 Housing, 2 Community services, 12 Sustainable transport, 14 Greenhouse gas emissions and 16 energy efficiency.

9.166 Under the second approach it is unknown, or assumed unknown, as to what might come forward. Given the unknowns the second approach records a number of question marks in respect of potential impacts, though it is appreciated that under a no policy approach it could be that for commercial or other reasons some of the specified uses could anyway be develop, and perhaps other non-listed in policy uses as well.

Secondary, cumulative and synergistic impacts

9.167 The healthy, mixed use and prosperous town centre sought after under policy could be expected to have a wide range of positive impacts on other sustainability considerations. For example a mixed use vibrant town centre is likely to lower crime levels (SA Objective 5) than one that does not have these characteristics.

Permanence and Timescale of impacts

9.168 A town centre should, eventually be a permanent feature and early delivery is clearly very desirable. Positive temporary impacts can be expected, as well, through allowing for temporary uses.

Scope for Mitigation

9.169 Whilst there are no specific identified negatives to mitigate against there may be scope to broaden policy coverage for the town centre to help turn predicted negligible impacts into positive outcomes (or to secure significant positive outcomes).

Table 9.23 - SA appraisal of Policy CB22 - Cranbrook Town Centre

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
The policy expectation to ensure the delivery of an economically successful town centre and one that meets its aspirations as being the focus of a healthy New Town, policy will support and make provision for the delivery of: • a health & wellbeing campus (including primary medical centre and children's centre); • the safeguarding of land for a future leisure centre; • Town Council Offices; • Extra care housing; • Transformer station for the roll out of District Heating to the expansion areas; • allocation of land for meanwhile uses; • as well as setting out a list of uses that will be supported.	+	+	0	++	0	0	++	0	0	0	0	+	0	+	0	+	0	++	++	+
The alternative identified to not have a policy for the town centre and instead to respond to planning applications that may come in on am ad-hoc or non-policy informed basis	?	?	0	?	0	0	?	0	0	0	0	0	0	0	0	?	0	?	?	0

Policy CB23 - Residential Development in the town centre and neighbourhood centres

9.170 The policy expectation is of promoting residential development above shops and commercial uses (above ground floor level) in Cranbrook town centre. The residential uses will be at higher density levels, should not adversely impact on viability and should be of high design quality with good amenity space.

Alternative Options

9.171 The identified alternative is to not have residential uses in the town centre.

Direct impacts

9.172 There are two significant positive benefits, assessed against the SA objectives under the policy approach, these are in respect of 1 – housing and 19 - town Vitality & viability. The policy explicitly seeks new homes in the town centre and as such this is directly compatible with the corresponding SA objective. A direct consequence of policy will, however, be to bring extra life and activity, including in the evening when shops typically close, into the centre of Cranbrook. This should make the centre of the town a more vibrant and active place. Minor positives are also noted in respect of SA objectives 5 – crime, as more life and activity should reduce potential and opportunity for crime, 12 - sustainable transport as residents of the town centre will have convenient, walking distance, access to facilities and this also accounts for the minor positive against AS objective 14 for greenhouse gas emissions and SA objective 20 - inward investment as more activity in the town should encourage more people to invest in the town. The concern noted in appraisal is potential for an uncertain impact in respect of SA objective 10 for amenity. However it is recognised that policy does explicitly refer to amenity considerations.

9.173 In contrast the absence of policy and expectation of not having residential development in the town centre is liable to have a series of negligible impacts, though in some case (notably where positive impacts were identified under policy) could see negligible turn to negative impacts. Where minor negatives are identified is in respect of 1 Housing, 12 - sustainable transport - 14 Greenhouse gas emissions and 19 Town Vitality & viability.

Secondary, cumulative and synergistic impacts

9.174 At a broad level having a residential population in easy reach of the town centre is considered to be a positive across a number of levels that should have wider positive ‘knock-on’ impacts.

Permanence and Timescale of impacts

9.175 The impacts of a residential population living in the town centre should be seen as a permanent outcome and early provision may help the town centre become established.

Scope for Mitigation

9.176 The issue of amenity, although covered in policy, is one that will require attention as work progresses on determining applications and implementation.

Table 9.24 - SA appraisal of Policy CB23 - Residential Development in the town centre and neighbourhood centres

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
To promote residential uses in the town centre in accordance with policy	++	0	0	0	+	-?	0	0	0	?	0	+	0	+	0	0	0	0	++	+
To not have or promote residential uses in the town centre	-	0	0	0	0	0	0	0	0	0	0	-	0	-	0	0	0	0	-	0

Policy CB24 - London Road Commercial and retail proposals

9.177 London Road is given specific attention through Policy CB24 which seeks to promote commercial activity and development in a defined area central to Cranbrook along the road. There is already commercial activity along this road and it is seen as an area for positive potential future provision.

Alternative Options

9.178 The alternative option that is appraised is one of not promoting commercial activity on this road frontage.

Direct impacts

9.179 The direct impacts, where a non-negligible affect is identified, associated with this policy approach relate to the SA objectives associated with economic considerations. Minor positive impacts are identified against SA objectives 18 Employment and 20 Inward investment on account of the jobs and investment the policy may bring about, over the longer term and if successful the minor positives could become significant positives. An uncertain question mark, however, is identified against SA objective 19 - town Vitality & viability. Policy wording seeks to protect vitality and viability of the town centre but if London road becomes the focal point for commercial activity it may be that it detracts from the town centre fulfilling its role to its greatest extent.

Secondary, cumulative and synergistic impacts

9.180 No specific secondary, cumulative and synergistic impacts are identified.

Permanence and Timescale of impacts

9.181 The expectation may be that it could take some time for London Road to fulfil its full commercial potential, albeit there is existing commercial activity and opportunities to expand on this may be forthcoming at any point.

Scope for Mitigation

9.182 The application and success of policy, alongside performance of the town centre, will warrant attention with possible longer term policy review.

Table 9.25 - SA appraisal of CB24 - London Road Commercial and retail proposals

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Promote commercial activity and development on London Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	?	+
To not promote commercial activity along London Road	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Policy CB25 - London Road Improvements

9.183 The policy expectation is that London Road will become a route "in" Cranbrook rather than a route around or through Cranbrook. Policy promotes high quality design and frontage to the road with safe pedestrian and cycle access and crossings.

Alternative Options

9.184 The alternative option is to see London Road as a through route or akin to a bypass for Cranbrook.

Direct impacts

9.185 There are a range of positive benefits identified as arising from policy though also some degree of uncertainty. In respect of SA objectives 8 - historic environment and 10 – amenity the minor positive impacts are tempered by questions marks indicating some uncertainty. London Road is an historic road and as such has some heritage interest in its own right. Any unsympathetic development could impact on its heritage value and likewise could adversely impact on amenity of residents and users of land at or close to the road. However a high quality treatment of the road and surroundings should have clear positive beneficial impacts.

9.186 Positive application of plan policy is identified as having minor positive benefits in respect to SA objective 12 - sustainable transport as it should make the road a more public transport as well as walking and cycling friendly road. Parallel reasoning also affords minor positive impacts against SA objectives 18 - employment and 20 – inward investment. Policy should provide for a more attractive and vibrant road and for this reason it would envisage that it should be more supportive of positive economic outcomes (especially when seen in conjunction with other policies of the plan (e.g. CB24).

9.187 The alternative option, one of treating London Road as akin to a bypass for Cranbrook would not see the positive benefits; in most cases the SA scores achieved are negligible in impact. However questions marks, denoting uncertainty are identified in respect of 6 – noise as a bypass could become quiet noisy (albeit this same consideration could apply to policy approach in the plan), 8 - historic environment on account of the potent given that bypass can, at worst, be unpleasant for non-vehicle users/occupants.

Secondary, cumulative and synergistic impacts

9.188 Application of policy in a successful and positive manner can be expected to have positive 'knock-on' impacts.

Permanence and Timescale of impacts

9.189 There can be expectation of permanency of impacts from application of policy and as London Road is quite long any actions could happen along differing lengths at differing times.

Scope for Mitigation

9.190 With questions marks of uncertainty identified in respect of SA objectives 6 - noise, 8 - historic environment and 10 – amenity it would be appropriate for consideration to be given to policy and specifically its implementation to ways to avoid or mitigate against possible negative impacts.

Table 9.26 - SA appraisal of CB25 - London Road Improvements

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Promote London Road as a route in the town with high quality design and frontage and safe pedestrian and cycle access and crossings	0	0	0	0	0	?	0	+?	0	+?	0	+	0	0	0	0	0	+	0	+
Promote London Road as a through route or akin to a bypass for Cranbrook	0	0	0	0	0	?	0	?	0	?	0	0	0	0	0	0	0	0	0	0

Policy CB26 - Allotments and community gardening

9.191 The policy expectation is for high quality allotment provision at Cranbrook with on-site storage and facilities. Community gardening areas and provision is also expected through policy.

Alternative Options

9.192 The alternative is not support and encourage allotment provision or community garden provision.

Direct impacts

9.193 The application of policy can be expected to see two specific significant positive impacts against SA objectives 4 – health and 7 - leisure and recreation. Being able to get into the outdoors and working with soil and plants is identified as having district health benefits as well as being positive (and highly affordable) recreational activity. Allied to these more significant benefits there are a series of minor positive benefits also identified – these are against SA objectives 2 community services, 3 education and skills, 9 landscape character, 10 – amenity, 11 – biodiversity and 13 - air, soil and water. These positives relate to community benefits and also environmental benefits. In comparison the option of not having allotment and community gardens scores negligible impacts across all SA objectives, though maybe some of these could potential be seen as negatives.

Secondary, cumulative and synergistic impacts

9.194 The assessment identifies positive benefits and no further specific secondary, cumulative and synergistic impacts are identified.

Permanence and Timescale of impacts

9.195 The impacts are expected to be permanent and whilst early provision of allotments is highly desirable the community gardening provision may more realistic be provided over time as residential areas are built out.

Scope for Mitigation

9.196 No mitigation is identified.

Table 9.27 - SA appraisal of CB26 - Allotments and community gardening

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Provision of high quality allotments and community gardening areas	0	+	+	++	0	0	++	0	+	+	+	0	+	0	0	0	0	0	0	0
To not have or support allotments or community gardens	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Policy CB27 - Landscape, Biodiversity and Drainage Strategy

9.197 There is a policy reference to development of production of a Landscape, Biodiversity and Drainage Strategy (LBDS) for each of the four allocated development areas. Appraisal of the approach is based on the positive green infrastructure, environmental, design and open space outcomes that policy seeks to ensure are delivered.

Alternative Options

9.198 This 'policy' provision is identified to be more about process matters, requiring an LBDS to accompany planning applications, rather than an actual policy approach to the issues. For this reason actual assessment and appraisal against alternatives is not seen as necessary, particularly noting that policies relating to landscape and biodiversity are already appraised through the plan.

Direct impacts

9.199 The policy is identified as having significant positive impacts against SA objectives of 9 - landscape character 11 – biodiversity, 13 - air, soil and water and 15 - flood risk. These are key component elements embedded in policy and therefore successful and appropriate implementation can be expected to be of significant positive benefits in these areas. Additional minor positive impacts are identified in respect of the SA objectives of 7 Leisure and recreation8 Historic environment and 10 – amenity.

Secondary, cumulative and synergistic impacts

9.200 Policy seeks high environmental standards in and through development which if successful should have wide ranging follow on impacts.

Permanence and Timescale of impacts

9.201 The benefits of policy implementation are identified as permanent as is the need for timely and typically early action and implementation.

Scope for Mitigation

9.202 No need for mitigation is identified.

Table 9.28 - SA appraisal of Policy CB27 – Landscape, Biodiversity and Drainage Strategy

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Policy for development of production of a Landscape, Biodiversity and Drainage Strategy	0	0	0	0	0	0	+	+	++	+	++	0	+	0	++	0	0	0	0	0

Policy CB28 - Design and Construction of Sports Pitches

9.203 The policy expectation is for sports pitches to be set out to the standards approved by sport governing bodies with provision of ancillary facilities to include, at sports hubs changing facilities sufficient to meet the number and type of pitches/courts provided at each hub, sufficient bar/social space, kitchen, dedicated medical room, toilets (separate for players, match officials and spectators), showers (in each changing room including the match officials), kit lockers, maintenance storage and car parking.

Alternative Options

9.204 The alternative approach identified is one of not having sports facilities or having lower quality facilities.

Direct impacts

9.205 Policy seeks to provide the best quality of sports pitches and associated facilities and as such has significant positive benefits, assessed against the SA objectives of 4 - health and even more significantly 7 - leisure and recreation. Uncertain and potential for minor negatives impacts are identified against SA objectives 9 - landscape character and 11 biodiversity. Sports pitches are large consumers of land and if poorly sited and implemented, including if, for example, significant land levelling work is required, they can have significant adverse landscape impacts. Furthermore sports pitches can be expected, because of management regimes, to be of very low ecological value and therefore can have adverse impacts both through land 'lost' for their provision (though this may be of limited relevance where the prior use was intensively managed and farmed land).

Secondary, cumulative and synergistic impacts

9.206 The significant health and community benefits of sports pitch provision and use can be expected to have wider positive impacts against the sustainability objectives.

Permanence and Timescale of impacts

9.207 Early delivery of sports facilities, to encourage active participation as residents move into home sis identified as important and impacts can be looked upon as permanent in nature.

Scope for Mitigation

9.208 In developing proposals care will need to be taken in respect of SA objectives 9 -landscape character and 11 – biodiversity in order to avoid adverse impacts or loss of important features or habitats.

Table 9.29 - SA appraisal of Policy CB28 - Design and Construction of Sports Pitches

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
To provide pitches and facilities in line with governing body standards	0	0	0	++	0	0	++	0	?	0	-?	0	0	0	0	0	0	0	0	0
To provide poorer quality pitches and not to governing body standards	0	0	0	+	0	0	+	0	?	0	-?	0	0	0	0	0	0	0	0	0

Policy CB29 - Tillhouse Farm Redevelopment

9.209 Tillhouse farm is a listed former farm house and associated buildings close to the town centre of Cranbrook that is in a poor state of repair. The policy provides for the sensitive restoration and reuse of the buildings with an aspiration for community activity and use.

Alternative Options

9.210 The buildings have deteriorated over recent years and the alternative option is to 'allow' for ongoing deterioration.

Direct impacts

9.211 The key significant positive impact of policy is in respect of SA objective 8 - historic environment, with policy explicitly seeking to protect and conserve the asset and fined a positive end use. In contrast the do nothing approach generates a significant negative impact against this objectives. Minor positive impacts are identified against SA objectives 2 community services, reflecting the potential for a community use of the building, 10 – amenity, because reuse would have wider positive amenity impacts and 18 - employment and 20 - inward investment on account of positive economic impacts that restoration and reuse could result in.

Secondary, cumulative and synergistic impacts

9.212 Depending on any reuse that is made of the farmhouse, and potential activities it may accommodate, a wide range of cumulative benefits could arise (as could wider direct benefits from those identified).

Permanence and Timescale of impacts

9.213 With the potential for ongoing deterioration it would be desirable for early and timely action on restoration. A restored building offers scope for a permanent asset for Cranbrook.

Scope for Mitigation

9.214 The required action is for restoration, no specific policy mitigation is identified.

Table 9.30 - SA appraisal of CB29 - Tillhouse Farm Redevelopment

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Apply policy and promote restoration and a community reuse	0	+	0	0	0	0	0	++	0	+	0	0	0	0	0	0	0	+	0	+
To accept ongoing and continued deterioration	0	0	0	0	0	0	0	--	0	0	0	0	0	0	0	0	0	0	0	0

Conclusions from Appraisal of Publication Policies and Cumulative Impacts

9.215 The appraisal of plan policies shows that overall they perform well when measured against the sustainability objectives and no alternative options appraised perform better than policies in the publication draft of the Cranbrook Plan.

9.216 The table on pages at the end of this section show, in the rows, the policy appraisal for all policies in the plan (but not the alternatives). Overall most of the policies see some significant positive outcomes when compared against the SA objectives, there are, however a number of distinct patterns that emerge. The SA objectives of 1 - housing, 2 - community services, 3 - education and skills, 4 – health, 7 - leisure and recreation, 12 - sustainable transport and 14 - greenhouse gas emissions. These are all key themes that run through the Cranbrook Plan and have been of critical importance in its production.

9.217 The key job of the Cranbrook Plan, and for Cranbrook in general, is to accommodate extra new housing and therefore it is appropriate that promoting decent homes for people to live in is positively promoted in plan policy. A clear cumulative impact of the plan will be, in a positive sense, new home provision. Alongside provision of housing there is, however, a strong theme, reflected in significant positive impacts in plan policy for supporting community infrastructure and facilities, including schools. Health is also an SA subject matter that policies strongly cover and address and this reflects the relevance to health that has been incorporated into and addressed through the Cranbrook Plan work and preparation. Allied to health is the issue of leisure and recreation which many plan policies also address in a positive manner.

9.218 The other subject matters that score highly against the SA objectives are 12 - sustainable transport and 14 - greenhouse gas emissions; the two have strong links anyway and sustainable transport, specifically by encouraging walking and cycling, has strong links with the health agenda. The green energy credentials of Cranbrook are also of great significance in plan policy hence SA assessment, this assists with generally positive scores for SA objective 16 for energy efficiency.

9.219 The SA economy objectives of 18 – employment, 19 - town vitality & viability and 20 Inward investment see fewer significant positive impacts and whilst a number of policies in the plan promote positive economic outputs they receive less direct policy support than the housing, community, health and green transport/energy subject areas. Also less explicitly addressed in policy, noting fewer significant positive scores, are the environmental themes addressed through SA objectives of 8 - historic environment, 9 - landscape character, 10 amenity and 11 - biodiversity. Any development can have some detrimental environmental impacts and when of a large scale these can be multiplied. It is for this reason that against the SA objectives the potential for some minor but not expected to be significant (assuming policy is effectively implemented) adverse impacts are noted.

9.220 SA objective 5 for crime sees no positive significant impacts in respect of policy assessment though there are no negative impacts, save for questions marks over possible security issues in respect of a transport policy. Noise is also an SA subject area with a number of potential negative impacts. Whilst policy is robust in respect of airport noise there remains some question marks over noise related to road vehicles, especially on

London Road, and also from the railway. Though it is recognised that some safeguards are built into policy.

9.221 Floor risk matters are specifically addressed through Policy CB27, with a significant positive impact noted when assessed against SA objective 27 that addresses flooding matters. In other respects negligible impacts scores are noted. Waste in the one SA objective subject matter where significant negatives are recorded. Any large scale development of housing is likely to generate high levels of waste.

9.222 This brief synopsis presents a positive policy agenda for Cranbrook as set out in the plan. The cumulative picture is one of high expectations in terms of housing provision in a healthy community with good facilities that is geared around encouraging people to walk and cycle.

Table 9.31 – Summary table of all Cranbrook plan policies compared against SA objectives

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
CB1 – Health and Wellbeing at Cranbrook	+	+	+	++	0	+ ?	++	0	0	0	0	0	0	+	0	0	0	0	0	0
CB2 – Bluehayes Expansion Area	++	++	++	++	0	-?	+	- ?	-	0	0	++	-	++	0	0	- -	+	+	+
CB3 - Treasbeare Expansion Area	++	++	++	++	0	-?	+	- ?	-	0	0	++	-	++	0	0	- -	+	+	+
CB4 - Cobden Expansion Area	++	++	++	++	0	-?	++	- ?	-	0	0	++	-	++	0	0	- -	+	+	+
CB5 - Grange Expansion Area	++	++	++	++	0	-?	++	- ?	-	0	0	++	-	++	0	0	- -	+	+	+
CB6 - Cranbrook Infrastructure Delivery	0	++	++	++	+	0	++	0	- ?	+	+ ?	++	0	++	0	++	0	0	+	+
CB7 - Design – Phasing	0	++	++	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
CB8 - Cranbrook and Broadclyst Station Built-up Area Boundaries	0	0	0	0	0	0	0	+	+	0	+	0	0	0	0	0	0	0	0	0
CB9 - Public Transport Enhancement	0	++	+	+	0	?	+	0	0	0	0	++	0	++	0	+	0	+	+	+
CB10 - Safeguard land for a second railway station	0	0	0	0	0	0	0	0	-?	0	0	++	+	+	0	0	0	0	0	0
CB11 - Cranbrook Affordable Housing	+	+	+	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
CB12 - Cranbrook Custom and Self-build housing	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+
CB13 - Delivering Zero Carbon	+	0	0	+	0	0	0	0	-	0	0	++	0	++	0	++	+	+	0	+
CB14 - Safeguarding of Land for Energy Centre	0	0	0	0	0	0	0	0	-	0	0	0	0	++	0	++	+	0	0	0
CB15 - Delivery of Suitable Alternative Natural Green Space (SANGS)	0	0	0	++	0	0	++	0	?	0	?	0	0	+	0	0	0	0	0	0
CB16 - Design Codes and Place Making	+	+	0	0	0	0	0	+	+	+	0	+	0	0	0	0	0	0	0	0
CB17 - Amenity of Future Occupiers	++	0	0	++	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0
CB18 – Digital Connectivity	++	0	0	0	0	0	+	0	0	0	0	?	0	0	0	0	0	++	?	++
CB19 – Coordinated sustainable travel	0	0	0	+	?	+	+	0	0	+	0	++	0	++	0	+	0	0	0	0
CB20 - Plug-In and Ultra low Emission vehicle charging	0	0	0	0	0	+	0	0	0	0	0	+	+	+	0	+	0	0	0	0

SA Objectives are on the top row –	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
CB21 - Parking at Cranbrook	+?	0	0	-?	0	0	0	0	0	+	0	-?	0	-?	0	0	0	0	0	0
CB22 - Cranbrook Town Centre	+	+	0	++	0	0	++	0	0	0	0	+	0	+	0	+	0	++	++	+
CB23 - Residential Development in the town centre and neighbourhood centres	++	0	0	0	+	-?	0	0	0	?	0	+	0	+	0	0	0	0	++	+
CB24 - London Road Commercial and retail proposals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	?	+
CB25 - London Road Improvements	0	0	0	0	0	?	0	+?	0	+?	0	+	0	0	0	0	0	+	0	+
CB26 - Allotments and community gardening	0	+	+	++	0	0	++	0	+	+	+	0	+	0	0	0	0	0	0	0
CB27 – Landscape, Biodiversity and Drainage Strategy	0	0	0	0	0	0	+	+	++	+	++	0	+	0	++	0	0	0	0	0
CB28 - Design and Construction of Sports Pitches	0	0	0	++	0	0	++	0	?	0	-?	0	0	0	0	0	0	0	0	0
CB29 - Tillhouse Farm Redevelopment	0	+	0	0	0	0	0	++	0	+	0	0	0	0	0	0	0	+	0	+

10 SA of Alternative Site and Land Development Options

10.1 This chapter of the SA considers alternative site specific development options. It does this in the context of earlier appraisal work, specifically the location principles as appraised in the earlier chapters. This chapter also explicitly cross-references back to the preceding chapter that assessed and examined Publication Cranbrook Plan policies that allocated or identified specific areas of land for development or specific purposes. It is stressed however, that this chapter of the appraisal is primarily concerned with in principle suitability of land for development as opposed to any specific policy wording that may be attached to or accompany any provision for development that may be made.

10.2 This chapter has been adapted from a chapter of the appraisal that originally featured at the Preferred Approach stage of plan making. At and prior to the Preferred Approach stage of plan making various land areas and sites had been promoted by land owners and agents for development. It was identified as important to consider all promoted options, and potential additional options as well, through the sustainability appraisal process.

10.3 Appraisal at the Preferred Approach stage of plan making indicated that the areas of land that were identified for development through the 2017 Masterplan work could be appropriate and suitable for development. In the context of site suitability (and this applies to the Preferred Approach stage of Plan making and also the now Publication stage) it is important to note and revisit the fact that in the Issues and Options report there were four alternative design scenarios that were mapped out. Amongst other matters plans were produced that coloured in differing blocks of land for possible development and different uses. The Issues and Options SA work concluded that Scenario 4 was expected to have broadly more positive effects on the SA objectives than the other alternatives considered.

10.4 The appraisal work at the Preferred Approach stage of plan making reinforced the general conclusions of the suitability of the Scenario 4 approach to development; site by site assessment should be seen in this context.

Site by Site Assessment at Publication Stage of Plan Making

10.5 The map in this chapter shows Cranbrook and areas of land at and around the town that could, in theory at least, have scope for development. The map is accompanied by the table that follows it and which forms a commentary of appraisal for each site comparing the identified site against the SA objectives.

10.6 In some cases sites identified in this chapter are sub-divided to reflect the fact that differing parts of larger site areas have differing characteristics or suitability for development and in the Cranbrook Plan are identified for differing uses.

10.7 Areas selected for assessment are based on examining existing Local Plan land allocations and also land areas that have current or past planning applications and/or areas of land being promoted for development by owners or agents – including through past Strategic Housing Land Availability Assessment (SHLAA) submissions and representations on the Cranbrook plan. The appraisal assesses sites where owners or interested parties

expressions of interest in undertaking development are in the public domain and also includes some extra areas identified by officers that could offer scope for development.

10.8 In selecting these areas for SA testing the work seeks to reflect land owner or developer aspirations for development of land. Though where an owner has indicated that land is not suggested for built development, but through submission indicated it is for some form of open space/non-developed use, this may be noted in appraisal.

10.9 There are a number of areas of land around Cranbrook that have **not** been assessed as part of this SA work. In some cases land close to Cranbrook that is in productive developed use or is being-developed separately from Cranbrook is not assessed, the most significant examples (in size terms) are the Skypark Business Park, the major freight depot and Exeter Airport. Extensive floodplain areas of land have not been assessed as the floodplain, specifically large tracts of floodplain, are taken as being near to or an absolute constraint for many forms of development, specifically new housing.

10.10 In respect of land areas on the edges of Cranbrook that have not been assessed the following observations are made:

- **Land to the west of Station Road** – the local plan western allocation sites have been appraised as have a number of small sites adjacent to London Road (sites C, D, E, W, U, V, W Z1 and Z2 on the map). However land to the west of these small site falls in a floodplain and this is seen as an absolute constraint to development and so assessment has not gone further westward.

- **Land to the north of the Exeter-Waterloo railway line** - assessment has not been undertaken on land to the north of the railway other than at and around Lodge Trading Estate (a small estate that is off Station Road which runs to Broadclyst – given site letter F on the map). Much of the land north of the railway line is in a floodplain and much is in National Trust ownership and is understood to be inalienable. In respect of other land north of the railway there would, in all probability, be the need for one or more new railway crossings or significant upgrading of existing, to enable or allow for development. The challenges and expense in securing new crossings are taken as a reason to discount such options, at least at this stage of Cranbrook's development. Furthermore other than where noted and appraised land north of the railway has not been promoted for development by land owners.

- **Land to the East of Cranbrook (north of London Road and south of the railway)** – the eastern allocation sites have been appraised and a small number of land areas promoted for development by land owners (specifically see sites I and J). It should be noted that the local plan allocated land is identified as part of G, H1 and K, the EDNCp included H2 in a past planning application but this is not a local plan allocated area of land. Other land, to the east, has for the most part not been promoted for development and it should be noted that, in part, land to the east rises quite sharply and is of landscape prominence and also, as you go eastward, becomes increasingly remote from Cranbrook facilities, either existing or planned.

- **Land to the south of London Road** – all land areas south of London Road, that abut or are close to the road, have been appraised. Land further south, has,

however not been assessed. Much of the land south of London Road forms the operational area of Exeter airport and to the East of the airport is Rockbeare village. Whilst sites have previously been promoted for development at and close to Rockbeare village they are some distance from Cranbrook, they physically relate to the village rather than Cranbrook and the village itself has been subject to consideration for development through the East Devon Local Plan adopted in 2016 and the East Devon Villages Plan adopted in 2018.

10.11 By clear intent and design, and unless of a significant scale, prominence or importance, assessment does not look into detailed site specific matters including such issues as possible access arrangements or detailed site specific features that may be particularly worthy or important to protect or which may place localised constraints on development. It should also be noted that assessment is typically based on appropriateness for development in general, with housing assumed to be the predominant land use, this is especially so for smaller sites. For the largest sites assessed the work assumes a mixture of housing and other facilities (such as schools and open spaces with these other facilities being needed or justified wholly or largely on account of housing provision (allocation policies, notably CB2 to CB5 inclusive, provide for mixed use development on allocated sites). Site assessment work has been undertaken by officers of the Council through office based interrogation of Geographical Information Systems as well through site visits and reviewing evidence documents.

10.12 Site assessment is primarily geared around general site suitability for development (typically housing). However where the Cranbrook Plan polices, as given spatial expression through the Policies Map, specifically allocate or identify an area of land for a defined use or range of uses, this is referred to in the commentary on the site.

10.13 As a general comment the success of Cranbrook to date has been reliant on securing developer contributions and direct developer provision of facilities and services. This is typically easiest and most credibly achieved on larger scale development sites and where mixed used comprehensive development schemes come forward. On smaller scale developments, those that are not large enough in their own right to provide facilities, it can be challenging to ensure that facilities and services are provided or that developers make equivalent or proportionate contributions to such facilities, including in a timely manner. This factor is reflected in SA appraisal of sites (though may be of greater importance in terms of wider factors that feed into decision making on appropriate land allocations) and it generally plays against the suitability and desirability of smaller sites as potential development options. On smaller sites (especially the smallest sites) the typical expectation applied in the appraisal is that housing will be the total or dominant use on any site should that site come forward for development.

10.14 In the tables in this site specific stage of assessment most of the potential impacts that could result from site development, as measured against the SA objectives, are commented on. This is especially so where impacts are identified as potentially being a significant positive benefit in nature or a significant negative. The scorings recorded are typically produced on the assumption of no mitigation though where mitigation could reasonably be expected then this is reflected in the scorings noted. Commentary may address scope or appropriateness for mitigation.

10.15 There are a number of general observations that are made about the way that scores are attributed to sites, these are:

- **SA Objective 1 - housing** – all of the sites appraised are done so on assumption of accommodating an element of or totally being for housing development. On the basis that they will accommodate housing they are all score a positive effect against SA Objective 1. However for the largest sites, those that offer scope to accommodate the highest levels of levels of new housing, a significant positive impact is recorded. The significant positive is a product of the larger numbers of houses these sites will deliver and specifically applies to sites A1 and A2, B1 and G.
- **SA Objectives 8 - historic environment, 9 - landscape character, 13 air, soil and water, 17 Waste** – in some cases there are particular features or reasons that explicitly inform site assessment but on a general level the larger sites, on account of their size, if nothing else, will frequently have significant negative impacts, because they will contain more development, whereas smaller sites, because if nothing else they are smaller, will have lesser adverse impacts.
- **Proximity to facilities** – in a number of cases assessment is based on proximity to facilities and specifically ease of walking. The SA of the East Devon Local Plan[18] established the appropriateness (see paragraph 5.6 of that assessment) of an up to 600 metre walking distance to facilities. This walking distance threshold, typically from a central part of any assessed site, is used to inform assessment work where ease of pedestrian access is seen as a relevant or important consideration.

10.16 It should be noted that the map in this chapter of the appraisal originally featured in the Preferred Approach appraisal report. At the Preferred Approach stage of plan making the sites assessed were identified in red text and red outline. In this new version of the map the red colour and site numbers have been retained. These red sites have, however, been augmented by a number of additional new sites that are subject to appraisal at this Plan Publication stage of assessment work, these new sites are shown in blue. Through this appraisal at Publication stage of plan making a more comprehensive review of sites, than that undertaken before, has been completed.

[18] See: http://eastdevon.gov.uk/media/1515306/psd2015w-2-sareportincpropchangesaug2015.pdf

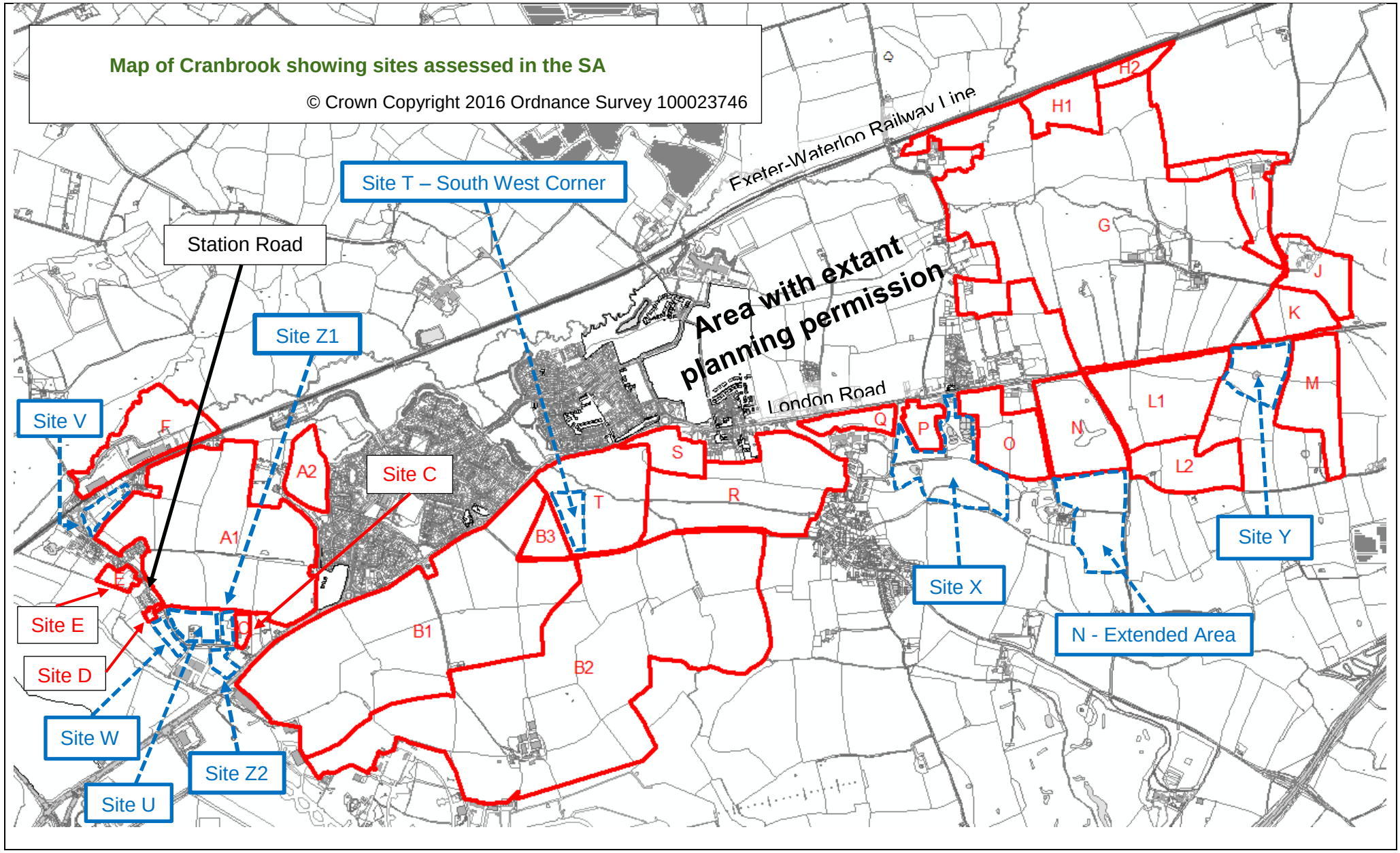
Map of Cranbrook showing sites assessed in the SA
© Crown Copyright 2016 Ordnance Survey 100023746
Exeter-Waterloo Railway Line
Station Road
Site T – South West Corner
Site Z1
Area with extant planning permission
London Road
Site V
Site C
Site E
Site D
Site W
Site Z2
Site U
Site X
Site Y
N - Extended Area
H2
H1
I
G
J
K
M
L1
L2
Q
P
O
N
S
R
T
B3
B1
B2
A1
A2
F
E

Table 10.1 - SA appraisal of alternative site development options

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site A1	++	++	++	++	0	-?	+	- ?	-	0	0	++	-	++	0	0	- -	+	+	+

Sites A1 was, in earlier work appraised alongside and in combination with Site A2. Site A2 is however now identified as open space in the Cranbrook Plan and current proposals will see it come forward for this use. In this appraisal at Publication stage the assessment applies to A1 only (separate appraisal of A2 has not been undertaken). Development of land to the west of the original built area of Cranbrook, which site A1 achieves, accords with broad positive approaches to achieving sustainable development set out in earlier work in this appraisal.

Appraisal of this land area shows that it performs well in sustainability terms. The area is substantial in scale and therefore it offers scope to accommodate a wide range of services and facilities that can be supplied in an integrated manner alongside substantial levels of housing as part of a comprehensive development scheme. The site also sits alongside the first phase of development at Cranbrook ensuring good access to existing services and facilities and being on the western edges of Cranbrook it is closer to major employment centres than others sites with benefits including reduced journey lengths to work. Given proximity to facilities the site scores significant positive benefits against SA objectives 1 – Housing, 2 - Community services, 3 - Education and skills, 4 – Health, 12 - Sustainable Transport and 14 - Greenhouse gas emissions. The latter two are informed by, amongst other matters, physical proximity to the railway station and existing public transport. Positive benefits are noted in respect of a number of SA objectives: - 7 - Leisure and recreation, 18 – Employment, 19 - town vitality and viability and 20 - inward investment on account of existing facilities, including employment sites west of Cranbrook, and policy CB2 requiring provision.

A significant adverse impact is identified against SA objective 17 as being a large site, in construction and operation (primarily people living in house), large levels of waste generation may be expected. In a number of cases negative impacts compared to SA objectives are identified for this the site; this includes in terms of avoiding adverse landscape impacts – SA objective 9. In landscape terms the site is quite flat with an absence of ridgelines where development could be of visual prominence though being a large site some adverse impacts could be expected. The site is relatively close to Exeter Airport and noise impacts are therefore a matter of possible concern, SA objective 6 - noise sees a negative SA impact, though noise concerns would be more relevant in the southern parts of the site rather than the northern. Mitigation measures, to some degree at least, would be possible to address adverse impacts and the site falls well beyond the airport 55 db line. There could also be possible noise concerns should any development be too close to London Road or the railway line. There are few historic assets, SA Objective 8, on or immediately around the site though negative impacts could be possible as would population and construction impacts on SA Objective 13 – air, soil and water.

Site A1 forms the bulk of the Cranbrook local plan Bluehayes expansion area as allocated under Policy CB2 of the plan. It should be noted that A2 is shown on the masterplan for potential SANGs land.

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Sites B1 and B2 combined	-	++	++	-	0	- -	+	- ?	- -	0	0	++	-	++	0	0	- -	+	+	+

The combined B1 and B2 area forms the approximate extent of the south-western expansion area proposed by the New Community partners in planning application 15/0046/MOUT. As the new community partners have proposed development of this extensive area it is appraised as a whole, but also see separate appraisal of area B1 below (and commentary on B2 as a standalone area). Area B1 forms a large part of the Treasbeare allocation under Policy CB3 of the plan.

B1 and B2, as a combined area, performs well in respect of some SA indicators and less well in respect of others. The area is substantial in scale and therefore it offers scope to accommodate a wide range of services and facilities that can be supplied in an integrated manner alongside substantial levels of housing, as part of a comprehensive development scheme. The site (especially part B1) is also close, albeit separated by London Road, from the first phase of development at Cranbrook ensuring good access to existing services and facilities and being on the western edges of Cranbrook it is closer to major employment centres than others sites with benefits including reduced journey lengths to work. Given proximity to facilities the site scores significant positive benefits against SA objectives 1 – Housing, 2 - Community services, 3 - Education and skills, 4 – Health, 12 - Sustainable Transport and 14 - Greenhouse gas emissions. The latter two are informed by, amongst other matters, existing public transport. Positive benefits are noted in respect of a number of SA objectives: - 7 - Leisure and recreation, 18 – Employment, 19 - town vitality and viability and 20 - inward investment on account of existing facilities, including employment sites west of Cranbrook, and policy CB2 requiring provision.

However, of critical relevance is the fact that large parts of B2, a substantial area in its own right, fall within an area that exceeds World Health Organisation noise limits and it is assumed for this appraisal that a substantial number of houses (as proposed in the planning application) would fall in this area; the significant adverse impacts on some of the area (especially B2 as opposed to B1) constitute collective negative impacts that are taken to affect the entire combined area. The most significant negative impact is in respect of SA objective 6 noise and exposure to noise. Concerns around noise, however, have wider adverse impacts when looking at other SA objective, specifically: 1 opportunities to live in a decent house; and 4 health. Education is highlighted with a question mark as impacts would depend on if a school is provided and if so where.

The other significant negative associated with this option is in respect of landscape impacts, SA objective 9. The B1 combined area crosses a ridgeline that is visible from Rockbeare village and development could have significant negative impacts. The positive benefits are generally related to the fact that the area is substantial in scale and therefore offers scope to accommodate a wide range of services and facilities that can be supplied in an integrated manner on the site as part of a comprehensive development scheme. The area scores especially well in respect of transport and greenhouse gas objectives, 12 and 14. Impacts are likely to be long term in nature. In respect of scope for mitigation, specifically for noise matters, this can be possible for internal spaces but there is limited scope for noise mitigation for outdoor spaces. Landscape impacts may be mitigated to some degree through quality of design and development but of more significance would be to not develop on and beyond ridgelines, this would mean limiting the degree to which eastward expansion of the B sites could occur.

Site B1 form the bulk of the Cranbrook plan Treasbeare expansion area as allocated under Policy CB3 of the plan. Site B2, except for some small parts on the northern edge allocated for recreation space use and employment use, is not allocated in the plan for development, though is shown to offer SANGs potential.

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site B1 only	++	++	++	++	0	-?	+	- ?	-	0	0	++	-	++	0	0	- -	+	+	+

Area B1 has been defined to exclude land to the south (area B2 - see above) a large part of which falls above the 55 db World Health Organisation noise threshold. By excluding areas above 55 dB level the health impacts, SA Objective 6, are reduced to (just) a negative impact. This also results in objectives 1 - opportunities to live in a decent house now achieving a significant positive scoring.

Appraisal of B1 shows that it performs well in sustainability terms. The area is substantial in scale and therefore it offers scope to accommodate a wide range of services and facilities that can be supplied in an integrated manner alongside substantial levels of housing as part of a comprehensive development scheme. Proximity to the first phase of development at Cranbrook will ensure good access to existing services and facilities and being on the western edges of Cranbrook it is closer to major employment centres than others sites with benefits including reduced journey lengths to work. Given proximity to facilities the site scores significant positive benefits against SA objectives 1 – Housing, 2 - Community services, 3 - Education and skills, 4 – Health, 12 - Sustainable Transport and 14 - Greenhouse gas emissions. The latter two are informed by, amongst other matters, physical proximity to the railway station and existing public transport. Positive benefits are noted in respect of a number of SA objectives: - 7 - Leisure and recreation, 18 – Employment, 19 - town vitality and viability and 20 - inward investment on account of existing facilities, including employment sites west of Cranbrook, and policy CB3 requiring provision.

A significant adverse impact is identified against SA objective 17 as being a large site, in construction and operation (primarily people living in house), large levels of waste generation may be expected. In a number of cases negative impacts compared to SA objectives are identified for this the site; this includes in terms of avoiding adverse landscape impacts – SA objective 9. In landscape terms the site avoids extending over ridgelines where development could be of visual prominence though being a large site some adverse impacts could be expected. The site is relatively close to Exeter Airport and noise impacts are therefore a matter of possible concern, SA objective 6 - noise sees a negative SA impact. Mitigation measures would be likely to be needed to address adverse impacts and some SA scores (notably for housing) are based on assumption that mitigation and sound insulation measures, if or where needed, would be incorporated. There are few historic assets, SA Objective 8, on or immediately around the site though negative impacts could be possible as would impacts on SA Objective 13 – air, soil and water.

Site B1 form the bulk of the Cranbrook plan Treasbeare expansion area as allocated under Policy CB3 of the plan.

Site B2 only – it should be noted that Site B2 has not been subject to appraisal in its own right as it is covered by the combined B1 and B2 assessment and it would not be a credible development option in the absence of B1 development. If it were assessed independently then the significant negatives associated with the B1 and B2 would explicitly apply to this site – most critically in respect of noise (SA Objective 6).

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Sites B3	++	++	++	++	0	0	+	- ?	-	0	0	++	-	++	0	0	-	+	+	+

Site B3 is proposed for development by the New Community partners in application 15/0046/MOUT. In early Cranbrook Plan work it was not proposed for development (hence its standalone identification as a site) but it is now identified as part of the larger Treasbeare allocation. The site generally scores well (sharing mostly the same SA outcomes as Site B1) when measured against the sustainability objectives.

In commenting on Site B3 it is assumed that its development would be undertaken as part of a scheme that extends over a larger scheme centred on site B1. When considered as part of a larger scheme the appraisal (as has been done in this work) shows that it performs well in sustainability terms. It offers scope to accommodate a wide range of services and facilities that can be supplied in an integrated manner alongside substantial levels of housing as part of a comprehensive development scheme. The site is close to the first phase of development at Cranbrook ensuring good access to existing services and facilities and being on the western side of Cranbrook it is closer to major employment centres than others sites with benefits including reduced journey lengths to work. Given proximity to facilities the site scores significant positive benefits against SA objectives 1 – Housing, 2 - Community services, 3 - Education and skills, 4 – Health, 12 - Sustainable Transport and 14 - Greenhouse gas emissions. The latter two are informed by, amongst other matters, physical proximity to existing public transport. Positive benefits are noted in respect of a number of SA objectives: - 7 - Leisure and recreation, 18 – Employment, 19 - town vitality and viability and 20 - inward investment on account of existing facilities, including employment sites west of Cranbrook, and policy CB3 requiring provision.

In a number of cases negative impacts compared to SA objectives are identified for this the site; this includes in terms of avoiding adverse landscape impacts – SA objective 9. In landscape terms the site is of some prominence, though more so eastern rather than western parts.

The westerly half of Site B3 is allocated under Policy CB3 of the plan for built development as part of the Treasbeare expansion area with the remainder for formal open space use.

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site C	+	+	+	+	0	-	+	0	0	0	0	++	-	++	0	0	-	+	+	+

This is a small site, around 0.6 hectares, submitted through past SHLAA processes (Ref W103). Measured against sustainability objectives it achieves not dissimilar ratings as the adjoining much larger Site A1 and A2. However, whereas the larger A1 and A2 site saw a number of significant positive benefits, for example for SA objective 1 - housing because this site is much smaller and would deliver much less scale of impact is reduced to (just) positive.

The positive benefits that are noted for Site C are in respect of SA Objectives: 1 – Housing, 2 - Community services, 3 - Education and skills, 4 – Health, 7 - Leisure and recreation and 18 – Employment. SA objectives 12 – sustainable transport and 14 – greenhouse gas emissions are recorded as achieving significant positives impacts.

However, this critique would only hold true under an assumption that the services and facilities that are required to support and complement development are actually provided and available. The site is some way, around 750 metres, from existing Cranbrook facilities (including shops and the primary school) and the site, being small scale, would not be able to secure direct on site delivery of facilities. Whilst this factors has not been applied in a manner that impacts on this SA assessment is does play against the site in respect of its potential suitability as an allocation for development. There is a timing issue at play in that the positive wider sustainability benefits identified would only hold true if facilities were open, available and in use before or at the same time that this site was developed and also these wider benefits would only apply (or would be most readily applicable) if there was easy access to facilities and this may only be possible through a coordinated development of this site and the adjoining Site A.

Site C is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site D	+	-	+	+	0	-	+	0	0	0	0	++	0	++	0	0	-	+	0	0

This is a small site, around 0.2 hectares, submitted through past SHLAA processes (Ref W314). Measured against sustainability objectives it achieves similar ratings as the much larger Site A that lies to its east and on the opposite side of Station Road. However, whereas the larger A1 and A2 site saw a number of significant positive benefits, for example for SA objective 1 – housing, because this site is much smaller and would deliver much less the scale of impact is reduced to (just) positive. - Positive benefits are noted in respect of a number of SA objectives: 1 – Housing, 3 - Education and skills, 4 – Health, 7 - Leisure and recreation and 18 – Employment.

However, this critique would only hold true under an assumption that the services and facilities that are required to support and complement development are actually provided and available. The site, being small scale, would not be able to secure direct on site delivery of facilities and whilst this factors has not been applied in a manner that impacts on this SA assessment is does play against the site in respect of its potential suitability as an allocation for development. Furthermore the fact that the site is on the western side of London Road, and access to Cranbrook facilities would entail crossing this road which can be quite busy, is seen in general as a negative and this, for example, accounts for a negative score in respect to SA Objective 2 which is concerned with community services. Furthermore the site lies around 950 metres from existing facilities at Cranbrook. There is a timing issue at play in that some of the positive wider sustainability benefits identified would only hold true if facilities were open, available and in use before or at the same time that this site was developed and also these wider benefits would only apply (or would be most readily applicable) if there was easy access to facilities and this may only be possible through a coordinated development of this site and the adjoining Site A.

Site D is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site E	+	-	+	+	0	-	+	0	0	0	0	++	0	++	0	0	-	+	0	0

Site E is a small site submitted through past SHLAA processes. Measured against sustainability objectives it achieves similar ratings as the much larger Site A1 and A2 that lies to its east and on the opposite side of Station Road. However, whereas the larger A1 and A2 site saw a number of significant positive benefits, for example for SA objective 1 – housing, because this site is much smaller and would deliver much less the scale of impact is reduced to (just) positive. Positive benefits are also noted in respect of a number of SA objectives: 1 – Housing, 3 - Education and skills, 4 – Health, 7 - Leisure and recreation and 18 – Employment.

However, this critique would only hold true under an assumption that the services and facilities that are required to support and complement development are actually provided and available. The site, being small scale, would not be able to secure direct on site delivery of facilities and whilst this factors has not been applied in a manner that impacts on this SA assessment is does play against the site in respect of its potential suitability as an allocation for development. Furthermore the fact that the site is on the western side of London Road, and access to Cranbrook facilities would entail crossing this road which can be quite busy, is seen in general as a negative and this, for example, accounts for a negative score in respect to SA Objective 2 which is concerned with community services. Furthermore the site lies around 1,050 metres from existing facilities at Cranbrook so access for pedestrians is poor. There is a timing issue at play in that some of the positive wider sustainability benefits identified would only hold true if facilities were open, available and in use before or at the same time that this site was developed and also these wider benefits would only apply (or would be most readily applicable) if there was easy access to facilities and this may only be possible through a coordinated development of this site and the adjoining Site A.

Site E is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site F	+	-	-	0	0	-	0	0	+	0	0	-	+	-	0	0	-	- -	0	0

This site has a gross area of around 9 hectares but a large part of this falls in a floodplain leaving a net area of around 5.6 hectares. A large part of the site was subject to a past SHLAA submission (Ref W048) and there have been past planning applications on the site including a recently dismissed appeal for 44 dwellings (Ref 16/0263/MOUT).

The site, specifically parts outside the floodplain, is or appears to be, predominantly brownfield land with some parts in productive use (albeit some parts apparently underused) and some parts are empty vacant buildings and yards and car parks. The sites scores a small number of positive effects, there are, however, more negative effects, specifically including community services (2) and education (3) – these negatives specifically reflect the fact that the site has poor accessibility to facilities being separated from Cranbrook by the railway and with pedestrian access to Cranbrook that entails walking over a poor quality, low pedestrian safety, road bridge via a lengthy circuitous route. It should also be noted that the road bridge is not ideal for extra vehicle use. A new pedestrian crossing over the railway from the site would greatly enhance access but no such bridge is currently planned and it would be expensive to provide. Allied to the poor accessibility are negatives scores in respect of sustainable transport (12) and greenhouse gas emissions (14) whilst a negative is recorded against town centre vitality given the poor connectivity of the site to centres in Cranbrook and the potential for residents of this site to not use Cranbrook facilities. The most significant impact in respect of this site is, however, a significant negative impact in respect of employment (18) as development for housing (or other non-employment use) would result in loss of employment land and therefore scope for future job provision.

Site F is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site G	++	++	++	++	0	-?	+	- ?	-	0	0	++	-	++	0	0	- -	+	+	+

Appraisal of Site G shows that it performs well in sustainability terms. The area is substantial in scale and therefore it offers scope to accommodate a wide range of services and facilities that can be supplied in an integrated manner alongside substantial levels of housing as part of a comprehensive development scheme. The site also sits close to prats of Cranbrook that are currently being developed and this should ensure good access to existing services. Given proximity to facilities and the scale of the site, it scores significant positive benefits against SA objectives 1 – Housing, 2 - Community services, 3 - Education and skills, 4 – Health, 12 - Sustainable Transport and 14 – greenhouse gas emissions. Positive benefits are noted in respect of a number of SA objectives including: 7 - Leisure and recreation, 18 – Employment, 19 - town vitality and viability and 20 - inward investment on account of existing facilities, including employment sites west of Cranbrook, and policy CB4 requiring provision. There are a number of negative impact scores recorded, including for 6 – noise with concerns over possible noise impacts from London Road and the railway. However it is presumed that any development would not be close to the railway line (in accordance with the masterplan) however if this were not the case then adverse impacts may be noted. QA negative, primarily on account of site size, for landscape impact – SA objective 9 is also noted. The western parts of the site are flatter and impacts might be expected to be lower but moving eastward across the site it becomes more hilly with more planting and existing landscape features and as such adverse impacts form development would be expected to rise.

A significant adverse impact is identified against SA objective 17 for waste as being a large site, in construction and operation (primarily people living in house), large levels of waste generation may be expected. There are few historic assets, SA Objective 8, on or immediately around the site though negative impacts could be possible as would population and construction impacts on SA Objective 13 – air, soil and water.

Most of Site G, specifically westerly parts, is allocated under Policy CB4 of the plan for built development as part of the Cobdens expansion area with the bulk of the none allocated site identified as offering potential for SANGs.

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site H1	+	+	+	+	0	- ?	+	0	0	0	0	+	0	+	0	0	-	0	0	0
This comparatively small site of around 4.6 hectares forms part of the land that that was subject to a planning application by EDNCp (the majority of the application being covered by Site G) and it is understood that the consortium have control of Site H1. Site H1 is not allocated in the East Devon local Plan but it is shown for development in the masterplan. The site generally performs well when assessed against the sustainability considerations with similar scores and considerations as applied to Site G appraisal (albeit it being smaller is scale some of the significant positives for site G are reduced to just positives for this site H1. Developed would be expected alongside and as part of comprehensive scheme with adjoining site G. It I highlighted that SA objective 6 – noise scores an uncertain negative. The site lies alongside the railway line and development, especially any development close to the line, could be adversely impacted by noise (at its worst it could potential amount to a significant negative impact). **The bulk of Site H1 is allocated for development in the Cranbrook Plan for built development. Only the most northerly part of the site, adjacent to the railway line, is not allocated and this is identified for recreation uses.**																			
Site H2	+	+	+	+	0	--	+	0	-	0	0	+	0	+	0	0	-	0	0	0
This small site of around 1.8 hectares forms part of the land that that was subject to a planning application by EDNCP (the majority of the application being covered by Site G). Site H2 is not allocated in the East Devon local Plan and is not shown for development in the masterplan. The site generally performs well assessed against a number of sustainability considerations as applied to site G and H1, albeit the site is further from existing and planned facilities than site H1. Positives effects are recorded for SA Objectives - 1 Housing, 2 Community services, 3 Education and skills, 4 Health, 7 Leisure and recreation, 12 sustainable transport and 14 greenhouse gas emissions. The notable negatives are in respect of 9 - landscape character and 6 - noise. The site slopes towards the railway, is of some prominence from views to the north and is not visually that well connected to other parts of Cranbrook proposed for development. Proximity to the railway may also be expected to generate noise impact concerns, perhaps to the point where they could be considered to be of a significant negative scale. **Site H2 is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary. It is however identified as offering potential to accommodate SANGs.**																			

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site I	+	+	+	+	0	+	+	0	-	0	0	+	0	+	0	0	-	0	0	0
This site of around 6.4 hectares is being promoted for development by agents acting for the landowner. Measured against the sustainability objectives it achieves similar ratings as the much larger Site G that lies to its west with the expectation of a number of positive benefits, albeit the site will be some way from core central facilities of Cranbrook, for example around 2,300 metres from the town centre. The site, being small scale, would not be able to secure direct on site delivery of facilities and whilst this factor has not been applied in a manner that impacts on this SA assessment is does play against the site in respect of its potential suitability as an allocation for development. There is a timing issue at play in that the positive wider sustainability benefits identified would only hold true if facilities, as part of the Cobdens development, were open, available and in use before or at the same time that this site was developed and also these wider benefits would only apply (or would be most readily applicable) if easy access to facilities was also secured through development. It should be noted that a negative landscape impact is identified in respect of this site on account if its location on the easterly edge of Cranbrook and the fact that on the eastern fringes of Cranbrook landscape sensitivity increases significantly and the site is elevated above land to the west. **Site I is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.**																				
Site J	+	+	+	+	0	+	+	- ?	-	0	0	+	0	+	0	0	-	0	0	0
This site of around 5.2 hectares is being promoted for development by agents acting for the landowner. Measured against the sustainability objectives it achieves similar ratings as the much larger Site G that lies to its west with the expectation of a number of positive benefits, albeit the site will be some way from core central facilities of Cranbrook, for example around 2,500 metres from the town centre. The site, being small scale, would not be able to secure direct on site delivery of facilities and whilst this factor has not been applied in a manner that impacts on this SA assessment is does play against the site in respect of its potential suitability as an allocation for development. There is a timing issue at play in that the positive wider sustainability benefits identified would only hold true if facilities, as part of the Cobdens development, were open, available and in use before or at the same time that this site was developed and also these wider benefits would only apply (or would be most readily applicable) if easy access to facilities was also secured through development. It should be noted that a negative landscape impact is identified in respect of this site on account if its location on the easterly edge of Cranbrook and the fact that on the eastern fringes of Cranbrook landscape sensitivity increases significantly. Also a possible negative historic environment impact is noted as the overall site includes a listed building that forms part of Little Cobden. It is recognised, however, that in illustrative material submitted that promoting the site the existing buildings are indicated as retained but even with retention there could be potential for adverse heritage impacts. **Site J is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.**																				

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site K	+	+	+	+	0	+	+	- ?	-	0	0	+	0	+	0	0	-	0	0	0

This site of around 4.4 hectares forms part of the land that that was subject to a planning application by EDNCp (the majority of the application being covered by Site G) and is understood to be in their control. Site K is allocated in the East Devon local Plan. Whilst the site generally performs well when assessed against the sustainability considerations the exceptions are is in respect of landscape and heritage matters. It should be noted that a negative landscape impact is identified in respect of this site on account if its location on the easterly edge of Cranbrook, though it is a flat area of land. A further concern in respect of this site is that it is comparatively remote from areas proposed for development, for example 2,400 metres from the town centre. A possible negative historic environment impact, SA objective 8, is noted given the listed building to the north of the site at Little Cobde.

In Cranbrook Plan policy terms site K falls into three roughly equal parts. The most westerly part is allocated for built development, the central strip is allocated for a gypsy and traveller site and the easterly part is shown for formal open space use.

The most westerly part of the site is the least sensitive in landscape terms and the central area would accommodate gypsy caravans, under plan policy, that are not as high as houses and so less likely to impact on skyline views.

Site L1	+	+	+	+	0	+	+	0	0	0	0	+	0	+	0	0	-	0	0	0

This site of around 12.4 hectares and it is identified for development in the masterplan. It should be noted that it was promoted for development alongside site L2, however L2 is not shown for development in the masterplan and having differing characteristics, especially in landscape terms, site L2 is appraised separately.

Generally L1 site performs well when compared against the sustainability objectives. Positives effects are recorded for SA Objectives - 1 Housing, 2 Community services, 3 Education and skills, 4 Health, 7 Leisure and recreation, 12 sustainable transport and 14 greenhouse gas emissions. However this observation holds true, to some degree, under an assumption that social and community facilities can be secured alongside site development. At a site size of 12.4 hectares, if developed on a standalone basis, the site could be expected to only support limited range of community facilities, therefore and to work effectively in sustainability terms, the site would have to form part of or be tied in some manner to a wider process of facility development and delivery.

Site L1 form a part of the Cranbrook local plan Grange expansion area as allocated under Policy CB5 of the plan.

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site L2	+	+	+	+	0	+	+	0	-	0	0	+	0	+	0	0	-	0	0	0
This site is around 6.8 hectares in extent and comments relating to this site should be read alongside those relating to Site L1. Site L2 is not identified for development in the masterplan. The site performs well when compared against a number of sustainability objectives. Though as with L1 this would only hold true under assumption of securing community facilities. Furthermore it is longer distance from existing and planned facilities at Cranbrook than site L1. A specific negative is identified for this site in respect of landscape impacts, SA Objective 9, on account of potential for development being of prominence from views from the south. **Site L2 is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary. It is, however, shown as offering scope for accommodating SANGs.**																			
Site M	+	+	+	+	0	+	+	0	-	0	0	+	0	+	0	0	-	0	0	0
Site M is around 8.2 hectares in extent and is being promoted for development by agents acting for the landowner. At preferred approach stage of plan making it was not shown for development in the masterplan and it is noted that as a standalone site it would be remote from a number of services in facilities, separated from the rest of Cranbrook by site Y which was not previously allocated for development but now is allocated. With Site Y now featuring as an allocation it is appropriate to revisit the assessment work for Site M. Site M generally performs well when compared against the sustainability objectives. Positives effects are recorded for SA Objectives - 1 Housing, 2 Community services, 3 Education and skills, 4 Health, 7 Leisure and recreation, 12 sustainable transport and 14 greenhouse gas emissions. However this observation holds true, to some degree, under an assumption that social and community facilities can be secured alongside site development. The site is, for example, around 2,400 metres from the town centre of Cranbrook and access to the town centre would involve crossing London Road. If developed on a standalone basis, the site could be expected to support only a limited range of community facilities, therefore and to work effectively in sustainability terms, the site would have to form part of or be tied in some manner to a wider process of facility development and delivery. A specific negative identified for this site is in respect of landscape impacts, SA objective 9, on account if it's location on easterly edges of Cranbrook and the fact that on the eastern side landscape sensitivity increases. The greatest concern in respect of landscape sensitivity applies, however, to the southern parts of the site where development could be of some prominence from views from the south and also the southerly parts of the site lies beyond and separated from the proposed areas of development of Cranbrook by a large block of woodland (the southern part of the site, taken alone, could justify a significant negative impact). **Most of the north of Site M is allocated for built development in the Cranbrook Plan as part of the Grange expansion area under Policy CB5.**																			

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site N	+	+	+	+	0	+	+	0	-	0	0	+	0	+	0	0	-	0	0	0

Site N extends to around 9.1 hectares. Generally the site performs well when compared against the sustainability objectives. Positive impacts are identified in respect of SA objectives 1 – housing, 2 – community services, 3 – education and skills, 4 – health, 6 – noise (though this may not hold true for any houses immediately next to or near to London Road), 12 – sustainable transport and 14 – greenhouse emissions.

However observation holds true, to some degree, under an assumption that social and community facilities can be secured alongside site development. At a site size of 9.1 hectares, if developed on a standalone basis, the site could be expected to support a limited range of community facilities, therefore and to work effectively in sustainability terms the site would have to form part of or be tied in some manner to a wider process of development and delivery.

The vast majority of the north of Site N is allocated for built development in the Cranbrook Plan as part of the Grange expansion area under Policy CB5, with the southerly edge shown as appropriate for SANGs provision.

Site N – Extended Area	+	+	+	+	0	+	+	0	--	0	0	+	0	+	0	0	-	0	0	0

At the Preferred Approach stage of plan making this site was not assessed in the SA but as it has been promoted for development assessment is seen as appropriate at this publication stage of work.

The site is very similar in terms of SA objectives scores as Site N, though in terms of accessibility to facilities is somewhat less attractive. However, it is in respect of landscape impacts, SA Objective 9, where a significant negative impact is identified. Parts of site are prominent in views from the south and the site extends over a ridgeline that separates it from the rest of the proposed development of Cranbrook.

Site N - Extended Area is not allocated for built development but is shown as offering potential for SANGs.

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site O	+	+	+	+	0	+	+	0	0	0	0	+	0	+	0	0	-	0	0	0
Site O extends to around 7.1 hectares. Generally the site performs well when compared against the sustainability objectives. However this observation holds true, to some degree, under an assumption that social and community facilities can be secured alongside site development. Positive impacts are identified in respect of SA objectives 1 – housing, 2 – community services, 3 – education and skills, 4 – health, 6 – noise (though this may not hold true for any houses immediately next to or near to London Road), 12 – sustainable transport and 14 – greenhouse emissions.At a site size of 7.1 hectares, if developed on a standalone basis, the site could be expected to support limited range of community facilities, therefore and to work effectively in sustainability terms, the site would have to form part of or be tied in some manner to a wider process of development and delivery. It should be noted that this site forms part of a larger land area submitted and promoted for development at the Issues and Options stage of plan consultation. In illustrative material that accompanied the submission a large part of the total submission site was not proposed for actual development, however as this section of land (Site O) was proposed to be built on it has been appraised. The other areas of land that were proposed for development in the same representation are appraised as Site P and Site Q in this appraisal. Whilst the site scores a negligible impact against SA objective 9 – Landscape Quality it is relevant to note that it falls within land shown as a Green Wedge in the East Devon Local Plan and this designation is afforded specific protection in the Made Rockbeare Neighbourhood Plan. **Site O is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.**																				
Site P	+	+	+	+	0	+	+	0	-	0	0	+	0	+	0	0	-	0	0	0
Site P extends to around 2 hectares in size. Across a number of the sustainability objectives the site performs well. Positive impacts are identified in respect of SA objectives 1 – housing, 2 – community services, 3 – education and skills, 4 – health, 6 – noise (though this may not hold true for any houses immediately next to or near to London Road), 12 – sustainable transport and 14 – greenhouse emissions. An exception, however, is in respect of landscape considerations, SA Objective 9. The negative landscape considerations relate to both visual impact concerns and also the fact that the village of Rockbeare is to the south of and close to Cranbrook and the village currently has a particular character in the landscape that is defined by surrounding open/undeveloped countryside. Development of this site would erode to a great extent that open character, noting as well that the site lies within the Local Plan Green Wedge and this designation is afforded specific protection in the Made Rockbeare Neighbourhood Plan. **Site P is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.**																				

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site Q	+	+	+	+	0	-	+	0	- -	0	0	+	0	+	0	0	-	0	0	0

Site Q extends to around 2.3 hectares in size. Across a number of the sustainability objectives the site performs well with proximity to the town centre of Cranbrook being in the particular favour of the town. Informed by proximity considerations the site performs well in respect of objectives - housing, 2 – community services, 3 – education and skills, 4 – health, 7 – leisure and recreation, 12 – sustainable transport and 14 – greenhouse gas emissions. Though these positives would only hold true under assumption that social and community facilities can be secured alongside site development. At a site size of only 2.3 hectares, if developed on a standalone basis, the site could be expected to support a limited range of community facilities, therefore and to work effectively in sustainability terms, the site would have to form part of or be tied in some manner to a wider process of development and delivery.

The notable exception with respect of potential impacts is in respect of landscape considerations, SA objective 9, where a significant negative effect is identified. The significant negative landscape considerations relate to both visual impact concerns and also the fact that the village of Rockbeare is to the south of and close to Cranbrook and the village currently has a particular character in the landscape that is defined by surrounding open/undeveloped countryside. Development of this site would erode to a great extent that open character, noting as well that the site lies within a local plan Green Wedge and this designation is afforded specific protection in the Made Rockbeare Neighbourhood Plan. Whilst some parts of the site would be less visually prominent than others and adjacent to London Road parts may be seen to be of limited landscape impact importance, at the land near or next to London Road, however, noise considerations may result in adverse impacts hence the negative recorded against SA Objective 6 for noise.

Site Q is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site R	+	+	+	+	0	0	+	0	- -	0	0	+	0	+	- -	0	-	0	0	0

This site was not previously proposed for development by landowners though is understood to be in the same ownership/control as the promoter of Site O, P and Q. Site R is indicatively show in the issues and options submissions by the site controllers as open space (as is land to the south of O, P and Q). Appraisal is undertaken at this stage of plan making work for reasons of completeness of assessment.

Across a number of the sustainability objectives the site performs well with proximity to the town centre of Cranbrook being in the particular favour of the site, albeit access to the town centre would involve crossing the busy London Road.. Informed by proximity considerations the site performs well in respect of objectives - housing, 2 – community services, 3 – education and skills, 4 – health, 7 – leisure and recreation, 12 – sustainable transport and 14 greenhouse gas emissions. Though these positives would only hold true, to some degree, under assumption that social and community facilities can be secured alongside site development

The notable exception with respect of potential impacts is in respect of landscape considerations, SA objective 9, where a significant negative effect is identified. The significant negative landscape consideration relate to both visual impact concerns and also the fact that the village of Rockbeare is to the east of the site and the village currently has a particular character in the landscape that is defined by surrounding open/undeveloped countryside. Development of this site, which is very open, would erode to a great extent that open character, noting as well that the site lies within a local plan Green Wedge and this designation is afforded specific protection in the Made Rockbeare Neighbourhood Plan.. It should also be noted that a large part of the site falls in a floodplain (though some is outside) hence the significant negative recorded against SA objective 15 for flood risk.

Site R is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

Site S	+	+	+	+	0	- ?	+	0	- -	0	0	+	0	+	0	0	-	0	0	0

Site S was not formally appraised at Preferred Options stage of plan making but is assessed now at Publication stage for completeness reasons. It is a small site in close proximity of many of the existing facilities of Cranbrook and close to the town centre, albeit is lies south of London Road. Proximity to planned and existing facilities plays to the favour of the site and helps account for positive scores against a number of the SA objectives, specifically 1- housing, 2, community services, 3 – education and skills, 4 – health, 7 – leisure and recreation, 12 sustainable transport and 14 – greenhouse gas emissions (with the last two informed by proximity and ease of access to public transport). However as the site fronts on to London Road there is some potential, with uncertainty noted, for negative noise impacts, SA objective 6, and more importantly a significant negative impact on SA objective 9 - landscape quality. This site falls in a Local Plan Green Wedge and is an open and visually exposed area of land and this designation is afforded specific protection in the Made Rockbeare Neighbourhood Plan.

Site S is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site T – Excluding S West Corner	+	+	+	+	0	- ?	- -	0	- -	0	0	+	0	+	0	0	-	0	0	0

Site T, excluding the south west corner, was shown on the sites appraised map with commentary at preferred approach stage of plan making but was not formally appraised. It is, however apprised now for completeness reasons. It is a small site in close proximity of many of the existing facilities of Cranbrook and close to the town centre, albeit it lies south of London Road. Proximity to planned and existing facilities plays to the favour of the site and helps account for positive scores against a number of the SA objectives, specifically 1- housing, 2, community services, 3 – education and skills, 4 – health, 12 sustainable transport and 14 – greenhouse gas emissions (with the last two informed by proximity and ease of access to public transport).

However as the site fronts on to London Road there is some potential, with uncertainty noted, for negative noise impacts, SA objective 6, and more significantly a significant negative impact on SA objective 9 - landscape quality and 7 – leisure and recreation. This site falls in a Local Plan Green Wedge and is an open and visually exposed area of land and a large part of it is identified for use as part of the country park and development would have significant adverse impacts on leisure and recreation use and potential.

Site T, excluding the south west corner, is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

Site T – South west corner only	+	+	+	+	0	0	0	0	- ?	0	0	+	0	+	0	0	-	0	0	0

The south west corner of site T is appraised separately from the remainder of Site T as part of this area is proposed for a gypsy and traveller site. It is a small site in close proximity to many of the existing facilities of Cranbrook and close to the town centre, albeit is lies south of London Road. Proximity to planned and existing facilities plays to the favour of the site and helps account for positive scores against a number of the SA objectives, specifically 1- housing, 2, community services, 3 – education and skills, 4 – health, 7 – leisure and recreation, 12 sustainable transport and 14 – greenhouse gas emissions (with the last two informed by proximity and ease of access to public transport).

There is possible potential however for negative effects, albeit with uncertainty noted, on landscape character – SA objective 9. The site falls in a local plan Green Wedge area and taller buildings on the site may be of some visual prominence. Though caravans, being significantly less high than two or three storey houses, would be much less prominent than 'bricks and mortar' housing. Planting and landscaping of the site could also provide mitigation from adverse impacts.

The south west corner of site T is allocated on the Cranbrook Plan Policies Map for a gypsy and traveller site.

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site U	+	0	+	+	0	-	+	0	0	0	0	++	0	++	0	0	-	+	0	0

Site U is a small area of land adjoining London Road. Measured against sustainability objectives it achieves similar ratings as the much larger Site A1 and A2 that lies to its east. However, whereas the larger A1 and A2 site saw a number of significant positive benefits, for example for SA objective 1 – housing, because this site is much smaller and would deliver much less the scale of impact is reduced to (just) positives. Positive benefits are noted in respect of a number of SA objectives: 1 – Housing, 3 - Education and skills, 4 – Health, 7 - Leisure and recreation and 18 – Employment. Because of access to public transport significant positives are identified against SA objectives 12 and 14 for sustainable transport and greenhouse gas emissions.

However, this overall critique would only hold true under an assumption that the services and facilities that are required to support and complement development are actually provided and available. The site, being small scale, would not be able to secure direct on site delivery of facilities and whilst this factors has not been applied in a manner that impacts on this SA assessment is does play against the site in respect of its potential suitability as an allocation for development. To its favour is the fact that the site is on the western side of London Road, and access to Cranbrook facilities would not entail crossing this road. But even without the need to cross the road the site is far from ideal in respect of pedestrian access to services, it lies around 850 metres from existing facilities at Cranbrook. There is a timing issue at play in that some of the positive wider sustainability benefits identified would only hold true if facilities were open, available and in use before or at the same time that this site was developed and also these wider benefits would only apply (or would be most readily applicable) if there was easy access to facilities and this may only be possible through a coordinated development of this site and the adjoining Site A.

Site U is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site V	+	+	+	+	0	+	+	0	0	0	0	+	0	+	0	0	-	0	0	0

Site V is a small area of land adjoining London Road. Appraisal of this land area shows that it generally performs well in sustainability terms. If planned and developed alongside site A1 and A2 it would ensure that the site offers scope to accommodate a wide range of services and facilities that can be supplied in an integrated manner alongside housing, on the site, as part of a comprehensive development scheme. The site is relatively close to the first phase of development at Cranbrook with reasonable access to existing services and facilities and being on the western edges of Cranbrook it is closer to major employment centres than others sites with benefits including reduced journey lengths to work and positive economic benefits; in this respect it scores significant positive benefits against SA objectives 12 - Sustainable Transport and 14 - Greenhouse gas emissions. Positive benefits are noted in respect of a number of SA objectives: 1 – Housing, 2 - Community services, 3 - Education and skills, 4 – Health, 7 - Leisure and recreation and 18 – Employment on account on policy provision in the plan requiring delivery. Because of access to public transport significant positives are identified against SA objectives 12 and 14 for sustainable transport and greenhouse gas emissions. It should also be noted that there are some community facilities in close by buildings to this site at and around Broadclyst Station (a former station on the railway line and buildings that developed around it).

In a number of cases negligible impacts compared to SA objectives are identified, however the site is close to both London Road and more importantly the Exeter to Waterloo railway and noise impacts are therefore a matter of possible concern, hence the negative impact scored against SA Objective 6 for noise.

Site V is allocated for built development in the Cranbrook Plan as part of the Bluehayes expansion area under Policy CB2.

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site W	+	-	+	+	0	-	+	0	0	0	0	++	0	++	0	0	-	+	0	0
This is a small site measured against sustainability objectives achieves similar ratings as the much larger Site A that lies to its east and on the opposite side of Station Road. However, whereas the larger A1 and A2 site saw a number of significant positive benefits, for example for SA objective 1 – housing, because this site is much smaller and would deliver much less the scale of impact is reduced to (just) positive. - Positive benefits are noted in respect of a number of SA objectives: 1 – Housing, 3 - Education and skills, 4 – Health, 7 - Leisure and recreation and 18 – Employment. However, this critique would only hold true under an assumption that the services and facilities that are required to support and complement development are actually provided and available. The site, being small scale, would not be able to secure direct on site delivery of facilities and whilst this factors has not been applied in a manner that impacts on this SA assessment is does play against the site in respect of its potential suitability as an allocation for development. Furthermore the fact that the site is on the western side of London Road, and access to Cranbrook facilities would entail crossing this road which can be quite busy, is seen in general as a negative and this, for example, accounts for a negative score in respect to SA Objective 2 which is concerned with community services. Furthermore the site lies around 950 metres from existing facilities at Cranbrook. There is a timing issue at play in that some of the positive wider sustainability benefits identified would only hold true if facilities were open, available and in use before or at the same time that this site was developed and also these wider benefits would only apply (or would be most readily applicable) if there was easy access to facilities and this may only be possible through a coordinated development of this site and the adjoining Site A. **Site W is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.**																				
Site X	+	+	+	+	0	-	+	0	- -	0	0	+	0	+	0	0	-	0	0	0
Across a number of the sustainability objectives site X performs well with proximity to the town centre of Cranbrook being in the particular favour of the site. Informed by proximity considerations the site performs well in respect of objectives - housing, 2 – community services, 3 – education and skills, 4 – health, 7 – leisure and recreation, 12 – sustainable transport and 14 – greenhouse gas emissions. Though these positives would only hold true under assumption that social and community facilities can be secured alongside site development. If developed on a standalone basis, the site could be expected to support limited range of community facilities, therefore and to work effectively in sustainability terms, the site would have to form part of or be tied in some manner to a wider process of development and delivery. The notable exception with respect of potential impacts is in respect of landscape considerations where a significant negative effect is identified against SA objective 9. The significant negative landscape considerations relate to both visual impact concerns and also the fact that the village of Rockbeare is to the south of and close to Cranbrook and the village currently has a particular character in the landscape that is defined by surrounding open/undeveloped countryside. Development of this site would erode to a great extent that open character, noting as well that the site lies within a local plan Green Wedge. Whilst some small northerly parts of the site would be less visually prominent the bulk of the site would be visually prominent. **Site X is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.**																				

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site Y	+	+	+	+	0	+	+	0	0	0	0	+	0	+	0	0	-	0	0	0
Generally site Y performs well when compared against the sustainability objectives. Positives effects are recorded for SA Objectives - 1 Housing, 2 Community services, 3 Education and skills, 4 Health, 7 Leisure and recreation, 12 sustainable transport and 14 greenhouse gas emissions. However this observation holds true, to some degree, under an assumption that social and community facilities can be secured alongside site development. As a relatively small site, if developed on a standalone basis, the site could be expected to only support limited range of community facilities, therefore and to work effectively in sustainability terms, the site would have to form part of or be tied in some manner to a wider process of facility development and delivery. **Site Y form a part of the Cranbrook local plan Grange expansion area as allocated under Policy CB5 of the plan.**																				
Site Z1	+	0	+	+	0	-	+	0	0	0	0	++	0	++	0	0	-	+	0	0
Site U is a small area of land adjoining London Road. Measured against sustainability objectives it achieves similar ratings as the much larger Site A1 and A2 that lies to its east. However, whereas the larger A1 and A2 site saw a number of significant positive benefits, for example for SA objective 1 – housing, because this site is much smaller and would deliver much less the scale of impact is reduced to (just) positives. Positive benefits are noted in respect of a number of SA objectives: 1 – Housing, 3 - Education and skills, 4 – Health, 7 - Leisure and recreation and 18 – Employment. Because of access to public transport significant positives are identified against SA objectives 12 and 14 for sustainable transport and greenhouse gas emissions. However, this overall critique would only hold true under an assumption that the services and facilities that are required to support and complement development are actually provided and available. The site, being small scale, would not be able to secure direct on site delivery of facilities and whilst this factors has not been applied in a manner that impacts on this SA assessment is does play against the site in respect of its potential suitability as an allocation for development. To its favour is the fact that the site is on the western side of London Road, and access to Cranbrook facilities would not entail crossing this road. But even without the need to cross the road the site is far from ideal in respect of pedestrian access to services, it lies around 850 metres from existing facilities at Cranbrook. There is a timing issue at play in that some of the positive wider sustainability benefits identified would only hold true if facilities were open, available and in use before or at the same time that this site was developed and also these wider benefits would only apply (or would be most readily applicable) if there was easy access to facilities and this may only be possible through a coordinated development of this site and the adjoining Site A. **Site Z1 is not allocated for built development in the Cranbrook Plan and is shown as outside of the Built-up Area Boundary.**																				

SA Objectives are on the top row – Site Areas are shown below with a summary commentary on site location	1 Housing	2 Community services	3 Education and skills	4 Health	5 Crime	6 Noise	7 Leisure and recreation	8 Historic environment	9 Landscape character	10 Amenity	11 Biodiversity	12 Sustainable transport	13 Air, soil and water	14 Greenhouse gas emissions	15 Flood risk	16 Energy efficiency	17 Waste	18 Employment	19 Town Vitality & viability	20 Inward investment
Site Z2	+	-	+	+	0	-	+	0	0	0	0	++	0	++	0	0	-	+	0	0

Site Z2 is a small site which measured against sustainability objectives achieves similar ratings as the much larger Site A that lies to its east and on the opposite side of Station Road. However, whereas the larger A1 and A2 site saw a number of significant positive benefits, for example for SA objective 1 – housing, because this site is much smaller and would deliver much less the scale of impact is reduced to (just) positive. Positive benefits are noted in respect of a number of SA objectives: 1 – Housing, 3 - Education and skills, 4 – Health, 7 - Leisure and recreation and 18 – Employment.

However, this critique would only hold true under an assumption that the services and facilities that are required to support and complement development are actually provided and available. The site, being small scale, would not be able to secure direct on site delivery of facilities and whilst this factors has not been applied in a manner that impacts on this SA assessment is does play against the site in respect of its potential suitability as an allocation for development. Furthermore the fact that the site is on the western side of London Road, and access to Cranbrook facilities would entail crossing this road which can be quite busy, is seen in general as a negative and this, for example, accounts for a negative score in respect to SA Objective 2 which is concerned with community services. Furthermore the site lies around 950 metres from existing facilities at Cranbrook. There is a timing issue at play in that some of the positive wider sustainability benefits identified would only hold true if facilities were open, available and in use before or at the same time that this site was developed and also these wider benefits would only apply (or would be most readily applicable) if there was easy access to facilities and this may only be possible through a coordinated development of this site and the adjoining Site A.

Site Z2 is allocated for built development in the Cranbrook Plan as part of the Bluehayes expansion area under Policy CB2.

Conclusions on Comparative Assessment of Site Development Options

10.17 The site specific assessment shows a number of consistencies across all sites. All sites assessed through the appraisal are done so on assumption of housing development and therefore they all see positive impacts against SA objective 1 for housing, though as sites A1, B1 and G are of the greatest size, and account for the bulk of land allocated under Policies CB2, CB4 and CB3 respectively, they all see significant positive impacts. The smaller sites, would not accommodate so much housing so taken individually their impacts are only recorded as positive. However, small sites group together or considered alongside and if developed as part of bigger comprehensive schemes, could attain the scale to warrant significant positive impacts. Policy CB5 for the Grange seeks to achieve collective delivery and if achieved this would indicate a significant positive collective impact for sites N, L1 and Y and the northern half of M taken as a single whole.

10.18 Further consistencies for positive impacts (and largest sites significant positive impacts) occur on many sites (but not all) against SA objectives 2 - Community services, 3 -Education and skills, 4 - Health, 7 - Leisure and recreation, 12 - Sustainable transport, 14 - Greenhouse gas emissions and the employment objectives of 18 - Employment, 19 - Town Vitality & viability and 20 - Inward investment. It is worth highlighting that the sites with greatest pedestrian accessibility, specifically shorter walking distances, to facilities and public transport, perform better against many of these objectives.

10.19 There are also some similar patterns for negative sustainability impacts occurring with larger sites, because being larger the scale of impact is greater, for example SA 17 - Waste, seeing significant negative impacts.

10.20 Where the greatest variations occur, and these are of particularly significance in helping inform policy and allocation choices, are in respect of SA objectives 6 for noise and 9 for landscape character. Sites B2 because of proximity to the airport and H2 because of proximity to the railway line are identified as seeing significant adverse impacts against SA objective 6 for noise though other sites, close to noise sources that include the airport and main roads and railways also see potential for negative impacts. In respect of landscape impacts, SA Objective 9, a number of sites see significant negatives impacts with these being on the southern side of Cranbrook, in many cases being exposed in open views from the south, and in a number of cases close to Rockbeare village. Sites with potential for significant negative impacts include B2, N (extended area), Q, R, S, T and X. All other sites see either negative (typically the bigger) or negligible (typically the smaller) landscape impacts. The only exception is site F which records a positive impact against SA objective 9 for landscape. This site, however scores a range of negatives against other SA objectives, specifically including 18 - Employment on account of loss of employment land, assuming a housing use comes forward.

10.21 The sites that are allocated for development in the Cranbrook Plan tabled below:

Table 10.1 sites allocated for development in the Cranbrook Plan

Allocation Policy	Sites Allocated	SA collective impacts and commentary for allocations	Excluded sites and commentary
CB2 - Bluehayes	A1, V, U and Z	These sites form the Bluehayes allocation. They form a coherent area for development stretching between existing development of Cranbrook to the west and London Road to the east. They perform well against many of the SA objectives.	Sites close by that fall outside of the allocation and outside of the Built-up Area Boundary, Policy CB10 in the plan, includes land that is to the west of London Road, sites E, D and W as well as sites C and Z1. These sites were assessed as inappropriate for inclusion in the Built-up Area Boundary. It should also be noted that Site F which is remote, separated by the railway, is also excluded from the allocation and Built-up Area Boundary.
CB3 - Treasbeare	B1 (small parts of B2, B3 and T south west corner	These sites form the Treasbeare allocation. They form a coherent area for development to the south of Cranbrook but excluding the vast majority of Site B2 that falls at and above the 55 dB noise level. The area extends westward up to but not beyond a ridgeline prominent in views from Rockbeare village. The allocated sites perform well against many of the SA objectives.	Sites that fall close by but outside of the allocation and Built-up Area Boundary include T, R and S and most of site T. These sites are all visually prominent and development could adversely impact on the setting and open character that surround Rockbeare village.
CB4 - Cobdens	Site G (most westerly parts), H1 and K	These sites form the Cobdens allocation. They form a coherent area for development to the west of Cranbrook but do not intrude into land further to the west that is more undulating in character, more intimate in scale and more heavily planted. They perform well against many of the SA objectives.	Sites that fall close by but outside of the allocation and Built-up Area Boundary are I and J. These sites are quite remote from the built form areas for Cranbrook and site I is on more elevated land. Much of the western side of site G is excluded from the allocation, it forms undulating land of higher landscape value than land to the east.
CB5 - Grange	M (northern half), Y, L1 and N	These sites form the Grange allocation. They form a logical south easterly extension to Cranbrook that avoids adverse landscape impacts but that remains reasonably close to the town centre and main facilities of the town.	Sites that fall close by but outside of the allocation and Built-up Area Boundary are Q, P, O the extended part of N and southern half of M. These sites are of some visual openness and prominence, including from Rockbeare village but more generally from views from the south.

Scope for mitigation where negative impacts are noted

10.22 All of the allocated sites (and this, under the assessment, would hold true for any allocated land) show negative impacts against SA objective 17. It is identified that Cranbrook wide mitigation measures could be appropriate to deal with waste considerations.

10.23 Potential for adverse noise impacts, SA Objective 6, are also noted for all of the allocations, but these have the potential for the severest impacts for the CB3 Treasbeare allocation in respect of airport generated noise. Mitigation specific measures are mentioned in plan policy. Other noise concerns that could affect all other sites include road noise, especially from London Road, and also for CB2 Bluehayes and CB4 Cobdens the from the railway line. Provision of mitigation could feature in policy where noise may be a possible issue though it is noted that the masterplan minimises immediate road frontage and especially railway frontage development.

10.24 In respect of the CB2, CB3 and CB4 there are potential adverse historic environment impacts, SA objective 8, that mitigation in policy could address or reference. All of the allocations could, as well, result in some adverse landscape impacts, SA Objective 9, and mitigation measures could be identified in policy provision. This same observation also holds true (and would do so for any large allocation) for SA Objective 13 air, soil and water.

10.25 The sites identified for development through the Cranbrook work, specifically as allocated on the Policies Map, generally perform better in the sustainability assessment than those that are not identified.

Summary of cumulative SA impacts of the land allocations

10.26 This chapter of the appraisal has considered overall suitability of land allocations and land areas that fall inside of the Built-up Area Boundaries in the vicinity of the allocations. Overall the land allocations typically have lesser adverse sustainability impacts than the non-allocated sites, this is especially so in respect of SA Objectives 6 for noise and 9 landscape impacts. Overall the allocations (specifically where formed by the larger sites but also in conjunction when smaller land areas are also part of the allocations) have significant positive impacts against SA objectives 1 Housing, 2 Community services, 3 Education and skills, 4 Health, 12 Sustainable transport and 14 Greenhouse gas emissions. They also have positive impacts against a range of the other SA objectives, specifically including - 7 Leisure and recreation, 18 Employment, 19 Town Vitality & viability and 20 Inward investment.

10.27 Landscape impact considerations were key to informing the Masterplan, which subsequently informed plan policies and land allocations, and through the SA work a number of sites on or close to the periphery of Cranbrook, especially on the southern side and south of London Road perform quite significantly less well than other options. On the eastern and western fringes of Cranbrook, beyond the Local Plan allocated sites, a number of smaller scale sites compare reasonably well in comparison to local plan allocations though there are concerns in respect of the ability of these sites to support and secure infrastructure and facilities alongside housing development

11 Monitoring

11.1 The SEA Regulations requires that *"The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action"* (Regulation 17) and that the environmental report should provide information on *"a description of the measures envisaged concerning monitoring"* (Schedule 2). Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

11.2 The Government guidance on SA states that it is not necessary to monitor everything. Instead, monitoring should be focussed on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. Due to the early stage of the Cranbrook Plan preparation process, the monitoring measures proposed in this initial SA Report relate to all of the SA objectives; however later in the SA process it should be possible to focus more specifically on the predicted significant effects only.

11.3 As previously discussed a number of the Cranbrook Plan options could have potential significant effects (both positive and negative) on the SA objectives. Therefore, it is recommended that monitoring is undertaken of the plan itself to determine whether these effects do indeed occur due to implementation of the Cranbrook Plan, and in order to seek to remedy or reverse them.

Suggested indicators for monitoring the sustainability effects of the Cranbrook Plan

11.4 **Table 11.1** presents suggested indicators for monitoring the potential significant sustainability effects of implementing the Cranbrook Plan. Note that the indicators proposed are included as suggestions, and are drawn from the indicators proposed in the SA Report for the East Devon Local Plan, reflecting the indicators proposed within the monitoring framework for the Local Plan itself.

11.5 In addition, the data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g. the Environment Agency) can also be used as a source of indicators. It will therefore be appropriate to continue the dialogue with statutory environmental consultees and other stakeholders commenced as part of the SA process and plan preparation, and work with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

Table 11.1: Suggested indicators for monitoring the sustainability effects of the Cranbrook Plan

SA objectives for which potential significant effects have been identified	Suggested indicators
1. To ensure everybody has the opportunity to live in a decent home.	• Number of new homes built annually within the town. • Percentage of all new homes delivered in the town that are affordable.
2. To ensure that all groups of the population have access to community services.	• Amount of community services delivered within Cranbrook including GP and school places.
3. To provide for education, skills and lifelong learning to: i. meet the needs of the local population, and ii. meet local employment needs.	• Number of new work-based apprenticeships offered in the town annually. • Number of new school places created in the town annually.
4. To improve the population's health.	• Levels of walking and cycling for commuting to and from Cranbrook.
5. To reduce crime and fear of crime.	• Number of crimes reported annually in the town.
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	• Number of noise pollution incidents reports annually in Cranbrook.
7. To maintain and improve cultural, social and leisure provision.	• Percentage of eligible open spaces managed to green flag award standard.
8. To maintain and enhance built and historic assets.	• Number of heritage assets within proximity of Cranbrook on the 'Heritage at Risk Register'.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	• Percentage of new development taking place on high quality agricultural land.
10. To maintain the local amenity, quality and character of the local environment.	• Number of complaints made to EDDC regarding noise pollution in Cranbrook.
11. To conserve and enhance the biodiversity of East Devon.	• Change in areas and populations of biodiversity importance, including (i) change in priority habitats and species (by type); and (ii) change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional significance (changes arising from development, management and planning agreements, in hectares and numbers of priority species type). • Amount of SANGs delivered.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	• Frequency of bus services in the town. • Frequency of rail services in the town. • Levels of bus and rail patronage.
13. To maintain and enhance the environment in terms of air, soil and water quality.	• Number of declared Air Quality Management Areas (AQMAs) in the town.

SA objectives for which potential significant effects have been identified	Suggested indicators
14. To contribute towards a reduction in local emissions of greenhouse gases.	• Renewable energy capacity installed by type. • Renewable energy generation in kWh by type over a monitoring period
15. To ensure that there is no increase in the risk of flooding.	• Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.
16. To ensure energy consumption is as efficient as possible.	• Renewable energy capacity installed by type.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	• Volume of waste generated in the town annually. • Percentage of waste generated in the town that is recycled.
18. To maintain sustainable growth of employment for East Devon, to match levels of jobs with the economically active workforce.	• Amount of land (defined by completed sqm gross floorspace) developed for employment by type.
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	• Amount of completed retail development in the town centre.
20. To encourage and accommodate both indigenous and inward investment.	• Amount of land (defined by completed SqM gross floorspace) developed for employment by type.

12 Conclusions and Next Steps

12.1 The SA work at this Publication draft stage of plan making has taken a systematic approach to appraising the Cranbrook Plan. Production of this SA has revisited the earlier assessment at Issues and Options stage and Preferred Approach stages of plan making. At this stage the primary purpose of appraisal is to support the publication plan and to form a full appraisal of the strategy, approach and policies of that plan.

12.2 This SA work has ensured that different reasonable alternative options and approaches have been assessed in order to inform future development and policy making for Cranbrook. The SA establishes a soundness of approach of the Publication draft of Cranbrook Plan.

12.3 Overall the plan is identified to have a considerable number of positive impacts, specifically including for housing provision (SA objective 1), noting that the key reason to plan for expansion of Cranbrook is to accommodate increased housing growth. Allied to the housing development the plan positively promotes community and social facilities (SA objective 2) and education provision (SA objective 3). The overall growth agenda is undertaken in the context of the plan achieving significant positive outcomes in respect of the SA objective for health (4) as well leisure and recreation (7) and promoting sustainable transport and reducing greenhouse gas emissions (12 and 14 respectively). Against other SA objectives generally positive conclusions were reached when assessed against plan policy, slightly more so for the economic objectives (18 – employment, 19 - town vitality & viability and 20 Inward investment) than the environmental (8 - historic environment, 9 - landscape character, 10 amenity and 11 – biodiversity).

12.4 It was only against the SA objective for waste (17) that there were significant negative impacts recorded; this reflects the fact that any large housing development is likely to generate large volumes of waste. It would be relevant to consider mitigation measures for waste and also for other cases where minor negative impacts could arise; these include in respect of landscape impacts noting that any large scale development is also likely to have potential for some adverse impacts.

Next steps and Cranbrook Plan Submission

12.5 The SA Report will be made available alongside the Publication Cranbrook Plan during the consultation period. Comments will be invited on the SA and those received, alongside comments received on the Cranbrook Plan, will be sent to the Planning Inspectorate for Cranbrook Plan examination.

Appendix 1 Initial (Regulation 18) Cranbrook Plan consultation

The June 2015 consultation stated that the Cranbrook Plan might do the following:

- Allocate specific sites and land areas for new development.
- Designate land for 'protection' or safeguarding which will prevent of limit development.
- Include policies, cross-referencing where appropriate to specific land areas, in respect of development of:
  - a) new homes;
  - b) Gypsy and Traveller accommodation;
  - c) community facilities;
  - d) education facilities;
  - e) sports and play areas and facilities;
  - f) shops;
  - g) parks and open space;
  - h) places of employment; and
  - i) other possible uses not detailed above.
- Establish the supporting infrastructure and means for its delivery required by the above uses.
- Establish forms and principles of development and materials and design standards to promote the highest quality outcomes.
- Define mitigation required to off-set potential adverse impacts that might otherwise arise as a consequence of development.
- Determine mechanisms for monitoring the success and quality of what is happening and being built and set targets.
- Determine whether planning applications submitted to the Council should be granted planning permission and what conditions might apply.

There were comments received from 24 respondents on this initial consultation. These can be viewed at:

http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/comments-on-initial-cranbrook-plan-dpd-consultation

Whilst comments covered a very broad range of issues, including many of relevance to issues and principle relating to sustainable development the only comment explicitly about the formal processes of Sustainability Appraisal and/or Strategic Environmental assessment was from:

The Environment Agency – who advised – *"Whilst we appreciate that the plan will likely be subject to a Sustainability Appraisal it would be good to see how the environment will be considered by the plan beyond simple mitigation and/or public green space."*

This comment is noted and this report is part of the overall Sustainability appraisal of the Cranbrook Plan.

Appendix 2 Scoping letter and consultation comments

At the start of the SA process LUC, acting for East Devon District Council, sent out a scoping report letter seeking comments. The text of the letter is reproduced below and a summary of responses received are tabled after the letter.

LUC
Environmental Planning
Design & Management

Our reference 6596
Date 24/09/15

Dear

SA/SEA Scoping for the Cranbrook Plan DPD

1. This letter is seeking your view on the scope of the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) of the Cranbrook Plan Development Plan Document (DPD), referred to in this letter as 'the Cranbrook Plan', which is being produced by East Devon District Council working in conjunction with Savills. The Cranbrook Plan will form part of the East Devon Local Plan, which is currently at the Examination stage. The Cranbrook Plan will identify suitable and appropriate land to allocate and will set out the proposed form and nature of future development within the Cranbrook Plan area.

2. In line with Government guidance[1], an integrated SA and SEA process is being undertaken in relation to the Cranbrook Plan. Therefore, throughout this letter the term 'SA' should be taken to mean 'SA incorporating the requirements of the SEA Directive'.

SA Scoping

3. Scoping is the first stage in the SA process, with the purpose of setting the context and objectives, establishing the baseline and deciding on the scope of the SA. The tasks involved in the Scoping stage include:

- Identifying other relevant policies, plans and programmes and sustainability objectives.
- Collating baseline information.
- Identifying sustainability issues and problems.
- Developing the SA framework
- Consulting on the scope of the SA.

4. Given the narrow scope of the Cranbrook Plan, plus the fact that a detailed SA Scoping consultation has already been undertaken for the East Devon Local Plan, instead of preparing a full Scoping Report LUC has set out the scope of the SA work for the Cranbrook Plan in the form of this Scoping letter for consultation with the statutory environmental bodies. This letter seeks to meet the requirements of the SEA Regulations in relation to this DPD as efficiently as possible.

[1] http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/

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5. LUC is currently undertaking SA work for East Devon District Council in relation to its emerging Local Plan. That SA work is being drawn on as appropriate during the SA of the Cranbrook Plan, to avoid unnecessary duplication. The most recent iteration of the SA report for the Local Plan was produced in August 2015 and relates to the submitted Local Plan, also taking into account the changes that have been proposed since then.

Outline of the Plan and relevant policy context

6. The first stage of production of the Cranbrook Plan was to consult on the matters and subjects that it might contain and address. In June 2015, East Devon District Council consulted organisation and individuals on the Planning Policy database that may have an interest in future Cranbrook development, by outlining what the Cranbrook may cover and seeking views on any alternative or additional issues that should be addressed. The consultation stated that the Cranbrook Plan might cover the topics listed below[2]:

- Allocate specific sites and land areas for new development;
- designate land for 'protection' or safeguarding which will prevent of limit development;
- include policies, cross-referencing where appropriate to specific land areas, in respect of development of:
    a) new homes;
    b) gypsy and traveller accommodation;
    c) community facilities;
    d) education facilities;
    e) sports and play areas and facilities;
    f) shops;
    g) parks and open space;
    h) places of employment; and
    i) other possible uses not detailed above.

- establish the supporting infrastructure and means for its delivery required by the above uses;
- establish forms and principles of development and materials and design standards to promote the highest quality outcomes;
- define mitigation required to off-set potential adverse impacts that might otherwise arise as a consequence of development;
- determine mechanisms for monitoring the success and quality of what is happening and being built and set targets; and
- determine whether planning applications submitted to the Council should be granted planning permission and what conditions might apply.

7. There are a wide range of relevant plans, policies and programmes that shape the policy context in which the Cranbrook Plan is being prepared. These have been reviewed in detail as part of the SA of the East Devon Local Plan, and the most relevant issues for the Cranbrook Plan specifically are summarised below.

[2] http://eastdevon.gov.uk/planning/planning-policy/emerging-plans-and-policies/the-cranbrook-plan-development-plan-document-2015/

8. The Cranbrook Plan must be in line with national policy as set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance and will also need to be in conformity with the emerging East Devon Local Plan, which is now at a late stage in its preparation. The Local Plan allocates land for development at Cranbrook (Strategy 9: Major Development at East Devon's West End and Strategy 12: Development at Cranbrook). Any additional development land that is allocated in the Cranbrook Plan would need to be within the wider Cranbrook Plan area that is allocated in Strategy 12 of the emerging East Devon Local Plan. The Local Plan policies also set out criteria that will apply to all new development at the West End of the District, including at Cranbrook (Strategy 10: Green Infrastructure in East Devon's West End and Strategy 11: Integrated Transport and Infrastructure Provision at East Devon's West End). Therefore, policies within the Cranbrook Plan must be in conformity with these and other strategic Local Plan policies, as well as the general development management policies in Section 2 of the Local Plan.

9. The Cranbrook Plan must also be in line with European SEA Regulations[3] and Habitat Regulations[4], and this SA/SEA Scoping letter forms the first stage in meeting the SEA requirements.

Habitats Regulations Assessment

10. The latest Habitats Regulations Assessment (HRA) work for the Local Plan is the August 2015 HRA Report, which has taken into account all of the proposed changes to the Local Plan as submitted in 2013, including the most recent proposed changes (August 2015). It concluded that, in light of the August 2015 proposed changes which reflect discussions between EDDC and Natural England, the Local Plan accords with the requirements of the Habitats Regulations, and parent European Directives, i.e. the implementation of the Plan would not have likely significant effects on the integrity of any of the European sites in and around East Devon. As the Cranbrook Plan is not seeking to provide for residential development in excess of that provided for through Local Plan policy, it is considered unlikely to have additional significant effects, and mitigation measures included in the South East Devon European Site Mitigation Strategy[5] (see below) should help to reduce the likelihood of significant effects occurring from implementation of the Cranbrook Plan. Should Cranbrook expand beyond the Local Plan proposed size, further HRA work could be required for the Cranbrook Plan.

Baseline Information

11. Baseline information provides the context for assessing the sustainability of proposals in the Cranbrook Plan and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. The requirements for baseline data vary widely, but it must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends. Annex 1(f) of the SEA Directive requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors.

12. Baseline information for the whole of East Devon District has been collated and regularly updated throughout the SA of the East Devon Local Plan and has been consulted on as part of the SA process. Key baseline information about the Cranbrook area specifically is summarised below.

[3] The Environmental Assessment of Plans and Programmes Regulations 2004.
[4] The Conservation of Habitats and Species Regulations 2010.
[5] South-east Devon European Site Mitigation Strategy. Footprint Ecology. June 2014.

Some of the information has been drawn from that gathered for the production of the Cranbrook Plan itself, as well as from datasets held by LUC (e.g. information about the proximity of flood zones and designated biodiversity sites).

13. Cranbrook is a rapidly developing new town in East Devon, close to the City of Exeter. By mid-2015 around 1,000 new homes had been built and were occupied. The emerging East Devon Local Plan proposes the expansion of Cranbrook up to 2031 to accommodate nearly 8,000 new homes. This scale of development would make Cranbrook the second biggest town in East Devon, after Exmouth.

14. On the basis of its current extent, Cranbrook is located approximately 2.5km to the east of Exeter at the nearest point, and is approximately 600m to the north of the Exeter Airport site. The railway line to the east of Exeter runs along the northern boundary of Cranbrook.

15. Cranbrook is being developed as a new town, to include employment land and services and facilities alongside the new housing. A new healthcare facility, Cranbrook Medical Practice, opened in spring 2015 and a new primary school, St Martins Primary, has also opened to serve the growing population. A second primary school and the first secondary school at Cranbrook are also opening in September 2015 at the new Cranbrook Education Campus. A respondent to the recent consultation on the Cranbrook Plan noted that Cranbrook is a very community spirited town with lots of activities going on.

16. There are no designated biodiversity sites within very close proximity of Cranbrook, although the East Devon Pebblebed Heaths Special Area of Conservation (SAC) and East Devon Heaths Special Protection Area (SPA) are approximately 3.5 km to the south east and the Exe Estuary SPA and Ramsar site is approximately 6.5 km to the south west. These sites are highly sensitive and the qualifying species and habitats that they are designated for are vulnerable to human pressures including recreation and general disturbance. In partnership with Natural England, the council and its neighbouring authorities of Exeter City Council and Teignbridge District Council have determined that housing and tourist accommodation developments in their areas will in-combination have a detrimental impact on the Exe Estuary SPA and East Devon Pebblebed Heaths SAC through impacts from recreational use. The impacts are highest from developments within 10 km of these European sites, and the Cranbrook Plan area falls within 10 km of both. The three Councils have prepared the South East Devon European Site Mitigation Strategy[6], which sets out a joint approach to mitigating the potential significant effects on the SAC and SPA including delivery of suitable alternative natural greenspace (SANG) sites to try to encourage dog walking and other recreation away from the sensitive European sites.

17. The Cranbrook development area is located some distance from the AONBs in East Devon, being approximately 4km from the East Devon AONB to the south/south east and 10km from the Blackdown Hills AONB to the east. Cranbrook lies in the 'lowland plains' landscape character type, as identified in the East Devon Landscape Character Assessment[7]. This area comprises low lying land adjacent to river valleys. It is flat and in mixed cultivation, with a variety of field size and pattern. Wide hedges, often elm-dominated, and hedgebanks are distinctive, often with prominent hedgerow oaks.

[6] South-east Devon European Site Mitigation Strategy. Footprint Ecology. June 2014.
[7] East Devon and Blackdown Hills Areas of Outstanding Natural Beauty and East Devon District Landscape Character Assessment and Management Guidelines (2008)

18. Most of Cranbrook lies outside of high flood risk zones, although there are areas of flood zones 2 and 3 which extend within the area that is allocated in the emerging East Devon Local Plan, across the northern boundary and through the centre of the area. Much of the Cranbrook development area is within Grade 3 agricultural land, although it is not known if this is Grade 3a or 3b. The northern part of the site is within Grade 4 agricultural land.

19. Rockbeare Manor Registered Park and Garden is located approximately 500m to the south east of Cranbrook and there are a number of listed buildings within and around the development area. Approximately 5km to the north west is the National Trust estate at Killerton (a Grade II listed Park and Garden).

20. There are no Air Quality Management Areas within or near to Cranbrook – the only one that has been declared in East Devon is within Honiton, further to the east. The proximity of Exeter Airport to the south of Cranbrook means that noise could potentially be a concern, as well as other possible impacts associated with airport operation.

Key Environmental and Sustainability Issues

21. Consideration of the policy context and baseline information enables the identification of key environmental and sustainability issues for the Cranbrook area, which will need to be taken into account in the SA of the Cranbrook Plan. These are largely similar to the key issues facing the wider District, although some are specific to Cranbrook and include:

- The need to ensure that large-scale new development is appropriately integrated into the landscape, respecting and enhancing local character where possible.
- The need to protect biodiversity (in particular the Exe Estuary SPA and East Devon Pebblebed Heaths SAC) from the impacts of large-scale development in the area, in particular increased recreation pressure.
- High flood risk in some parts of the development area.
- The need to conserve and enhance the setting of listed buildings and other heritage features.
- The need to avoid high levels of car use by balancing residential development with an appropriate range of employment opportunities, services and facilities.

SA Framework

22. The development of a set of SA objectives is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared, with each proposal in the plan being scored against each SA objective. It is considered appropriate to make use of the SA framework that is being used for the SA of the East Devon Local Plan as those objectives have been designed to address the key sustainability issues facing East Devon District, which are also relevant at the local level for Cranbrook. The SA framework, which has been consulted on throughout the SA of the Local Plan, is presented in **Table 1**, which also notes which of the SEA topics each objective addresses.

Assessment methodology for the Cranbrook Plan

23. All of the options for the Cranbrook Plan, including any reasonable alternative options, will need to be subject to SA. This will therefore include strategic options for the overall development of the area, specific site options if there are choices to be made and any options that there may be for policies to be included in the Plan. The SA work for the Cranbrook Plan will be undertaken in the

context of the SA work that has already been undertaken in relation to the allocated land, during the preparation of the emerging East Devon Local Plan.

24. Each policy and/or site option will be subject to SA using broadly the same methodology as we have used for the SA of the Local Plan, i.e. setting out the assessment of each policy or site option in a matrix with a score and a brief justification for that score being given for each objective.

25. We will also make use of the Published Map File (PMF) that we produced for use in the SA of the Local Plan site options, which is an interactive electronic map of the district showing a number of different geographical features (e.g. urban areas, transport routes, nature conservation and cultural heritage designations, flood zones etc.). Data showing the location and boundaries of all options for development within the wider Cranbrook area will be added to the PMF, and will enable the SA team to consider the proximity of the site options to potential sensitive receptors or other constraints/opportunities for development.

Table 1: SA Framework for the Cranbrook Plan

SA Objective	SEA Topic(s)
1. To ensure everybody has the opportunity to live in a decent home.	Population, human health, material assets.
2. To ensure that all groups of the population have access to community services.	Population, human health, material assets.
3. To provide for education, skills and lifelong learning	Population, material assets.
4. To improve the population's health	Population, human health.
5. To reduce crime and fear of crime.	Population, human health.
6. To reduce noise levels and minimise exposure of people to unacceptable levels of noise pollution.	Population, human health.
7. To maintain and improve cultural, social and leisure provision.	Population, material assets.
8. To maintain and enhance built and historic assets.	Cultural heritage including architectural and archaeological heritage.
9. To promote the conservation and wise use of land and protect and enhance the landscape character of East Devon.	Soil, landscape.
10. To maintain the local amenity, quality and character of the local environment.	Fauna, flora, soil, water, air, landscape.
11. To conserve and enhance the biodiversity of East Devon.	Biodiversity, fauna, flora.
12. To promote and encourage non-car based modes of transport and reduce journey lengths.	Human health, air.
13. To maintain and enhance the environment in terms of air, soil and water quality.	Soil, water, air.
14. To contribute towards a reduction in local emissions of greenhouse gases.	Air, climatic factors.
15. To ensure that there is no increase in the risk of flooding.	Water, human health, material assets.
16. To ensure energy consumption is as efficient as possible.	Climatic factors.
17. To promote wise use of waste resources whilst reducing waste production and disposal.	Material assets.
18. To maintain sustainable growth of employment for East	Population, material assets.

SA Objective	SEA Topic(s)
Devon, to match levels of jobs with the economically active workforce.	
19. To maintain and enhance the vitality and viability of the Towns of East Devon.	Population, material assets.
20. To encourage and accommodate both indigenous and inward investment.	Population, material assets.

SA Report

26. Once the SA matrices are finalised the findings will be compiled into a draft SA report. This will be structured so as to meet all of the requirements of Annex 1 of the SEA Directive, and will include:

1 An outline of the contents of the Cranbrook Plan and its relationship with other relevant plans, policies and programmes (including in particular its relationship with the emerging East Devon Local Plan).
2 The environmental, social and economic characteristics of the Cranbrook area, including any problems or issues and their likely evolution without the Cranbrook Plan (in many cases the policies in the emerging Local Plan are likely to address the issues to some extent).
3 Key environmental, social and economic policy objectives set at the international, national and local level of relevance to the Cranbrook Plan.
4 The SA framework being used for the SA of the Cranbrook Plan.
5 The reasonable alternatives considered, including how they performed in sustainability terms and an outline of East Devon District Council's reasons for selecting particular options for inclusion in the Cranbrook Plan.
6 Any difficulties encountered during the SA process, e.g. data limitations.
7 The significant effects of the Cranbrook Plan on each of the SA objectives, taking into account mitigation (which may be provided by policies in the Cranbrook Plan and emerging Local Plan).
8 A proposed monitoring framework for monitoring the significant effects identified (this is likely to link closely with the monitoring framework for the emerging Local Plan).
9 A Non-Technical Summary which summarises all of the above.

27. The SA report will also include an appendix setting out the Scoping consultation comments received and noting how each one has been addressed in the full SA report (e.g. any resulting amendments made to the SA objectives or baseline information).

Consultation and Next Steps

28. The SEA Regulations require a local authority to consult the statutory environmental bodies (Historic England, the Environment Agency and Natural England) regarding the scope of an SA/SEA for a minimum of five weeks. On behalf of East Devon District Council, LUC is now inviting comments on the scope of the SA as set out in this letter. In particular, the consultees are requested to consider:

- Whether there are any additional plans, policies or programmes that are particularly relevant to the SEA of the Cranbrook Plan.

- Whether the baseline information provides a suitable baseline for the SEA of the emerging Cranbrook Plan.
- Whether there are any additional key sustainability issues that should be included.
- Whether the SA framework is appropriate and includes a suitable range of objectives (note that the framework has already been consulted on in relation to the SA/SEA of the Local Plan).

29. The responses from this consultation will be reviewed and taken into account during the assessment of the Cranbrook Plan against the SA objectives. The SA report will explain how any consultation responses have been addressed.

30. Please return your comments by 30th October 2015 to myself, either at the address at the top of this letter or via e mail to the address below.

Yours sincerely,

Kate Nicholls
Principal Environmental Planner
LUC
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Table A1.1: Consultation responses received in relation to September 2015 Scoping letter

Consultee	Response	LUCs response
Honiton Town Council	Your letter was reviewed by the Town Council's Planning Committee on 6th October. The Town Council wishes to thank you for consulting and to advise that it has no comments to make.	Noted, no action required.
Marine Management Organisation	I have reviewed the document sent and have no comment on behalf of the MMO. Predominantly, the MMO are concerned with works carried out below Mean High Water Springs and as such this scoping letter is rather outside of our remit as far as I can see.	Noted, no action required.
National Trust	Paragraph 16 of the SEA Scoping letter states that there are no biodiversity sites within very close proximity of Cranbrook. However, Hellings Park Fen just north of the railway line at Wishford Farm, on the Killerton estate, is a County Wildlife Site as designated by the Devon Wildlife Trust. Further away the park and woods north of Killerton House are designated SSSI for their geology. Ashclyst Forest, although not designated an SSSI, is also of national importance for its lichens and the number of veteran trees it includes (the forest also supports an important population of pearl-bordered fritillary butterfly, a greatly declined UK Biodiversity Action Plan Priority Species and is important for bats). Ashclyst Forest is also a County Wildlife site.	Noted. The baseline information has been expanded to refer to these locally designated biodiversity sites (see **Chapter 3**).
National Trust	Paragraph 19 of the SEA Scoping letter identifies the Killerton Registered park and garden. However, the baseline information needs to be corrected in terms of the status of the heritage assets concerned, as identified in the *Background* section above; specifically that the park and garden is in fact grade II*, not grade II. The Conservation Area at Broadclyst should also be mentioned. Reference should be made to the *Killerton Setting Study* produced by Land Use Consultants in 2013. The Killerton setting study locates Cranbrook principally within a sub-area of the *Lowland Plains* landscape character type, *character area 6c*, which forms the middle to distant setting to the southern part of Killerton Park, featuring in key views from Killerton Garden. The study recognises this area to only be of low significance to the Park and currently subject to the greatest degree of change of all the areas covered by	Noted. The reference to Killerton in the baseline information has been corrected and reference to the Conservation Area at Broadclyst has been added. The need to consider the findings of the Killerton Setting Study is also referred to in the updated baseline information (see Chapter 3).

Consultee	Response	LUCs response
	the study. However, whilst the area is of low significance to Killerton Park it should still be noted that the DPD area falls within the defined '*Zone of Potential Influence*', and the setting study should form part of the evidence base of the DPD and a proportionate assessment of impact be made in relation to potential development. National policy in relation to 'plan-making' is clear that "Local planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to the environment." (NPPF; para 169)	
National Trust	**Key Environmental and Sustainability Issues** Specific mention should be made of the Clyst Valley Regional Park proposal. The Trust strongly supports Green Infrastructure (GI) forming an integral part of the vision for sustainable growth in the Exeter and East Devon Growth Point area. The *Killerton Estate and Ashclyst Forest* 'Strategic Project' identified in the Green Infrastructure Strategy Phase 2 for the Exeter Area and East Devon New Growth Point (2009; Pages 12 and 15), plans for the "*enhancement of Killerton Estate and Ashclyst Forest as a key recreation and leisure asset and valuable wildlife habitat*" with the new community at Cranbrook being encouraged to "*make full use of the enhanced leisure and recreational facilities at the Forest*" (page 22). The New East Devon Local Plan Strategy 10 for East Devon's West End promotes the Clyst Valley Regional Park (CVRP) as a Green Infrastructure initiative that will provide high quality natural green space, and makes clear that developer contributions will be used to help deliver this 'landscape' scale strategic project (Strategy 10 – Green Infrastructure in East Devon's West End). At the Examination of the East Devon Local Plan the Council indicated that the CVRP could potentially function as a Suitable Alternative Natural Green Space (SANGS) to mitigate the recreational impact of additional visitors on the protected European wildlife sites of the East Devon Pebblebed Heaths and the Exe Estuary.	Noted. Information has been added to the baseline information in relation to Clyst Valley Regional Park (see Chapter 3).

Consultee	Response	LUCs response
	The Trust has recently produced *A Prospectus for Action; Opportunities arising from the Exeter and East Devon Growth Point*, prepared by Land Use Consultants (August 2015), which has already been submitted to the Council to form part of the evidence base for the Local Plan and specifically the Cranbrook DPD (copy attached). This highlights the need for a *Growth Point Green Infrastructure Masterplan*. The Cranbrook DPD should tie in with such a Green Infrastructure Masterplan, and specifically the planning for, and delivery of, the Clyst Valley Regional Park. The Trust has also commissioned a SANGs assessment for Killerton from Footprint Ecology, which is forthcoming.	
National Trust	Under the first bullet, of paragraph 21 of the letter, the impact of the development of Cranbrook on the wider road network, particularly north of the rail line, needs to be considered as an issue. Already we are seeing an increase in traffic along narrow Devon lanes and inevitably 18-20,000 new residents with their cars is going to bring about significant change, impacting the character of the current rural landscape. Would this increased movement activity be deemed to "*respect and enhance*" local character? And if not, consideration needs to be given to the steps necessary to mitigate this impact. The third bullet should also cover any likely impact, from the expansion of Cranbrook, on the flood plain of the strategic watercourses within the study area, particularly in relation to Trust land. The fourth bullet should specifically mention parks and gardens, given the Killerton setting study mentioned above. Finally, there is the issue of the new railway station only currently being proposed to have access from one side of the track, with no pedestrian or cycle crossing currently proposed at Cranbrook station. This would not be taking the opportunity to maximise its potential contribution to SA objectives, specifically SA objective 12, by not helping encouraging use of non-car based modes of transport by local communities north of the rail line. This needs to be considered as an issue.	Noted. An additional key sustainability issue has been added (see Table 3.1) in relation to the need to consider the impacts of development on the transport network. The key sustainability issue relating to flood risk has been amended to make reference to the need to consider the impacts of development at Cranbrook on strategic watercourses (see Table 3.1). The key sustainability issue relating to conservation and enhancement of heritage assets has been amended to make reference to the need to consider the impacts of development at Cranbrook on Killerton Park and Garden (see Table 3.1). As noted earlier in this table, an additional key sustainability issue has been added in relation to the potential for development at

Consultee	Response	LUCs response
		Cranbrook to impact upon the local transport network (see Table 3.1). The impacts of proposals in the Cranbrook Plan on levels of sustainable transport use will be considered through the appraisal of options against SA objective 12: To promote and encourage non-car based modes of transport and reduce journey lengths.
National Trust	**SA Objectives** A Sustainability Appraisal objective should specifically relate to Cranbrook being developed within the context of 'landscape scale' strategic infrastructure projects, and directly contributing to their delivery. SA objective 8 should make reference to heritage assets *and their setting.*	Noted. SA objective 8 has been amended to refer to impacts on the setting of heritage assets.
Natural England	Our comments relate to the following: • **The scope of the Cranbrook Plan SA/SEA** • **The HRA of the Cranbrook Plan** **Scope of the Cranbrook Plan SA/SEA** Your scoping letter refers to the relatively narrow scope of the Cranbrook Plan within the context of the East Devon Local Plan. We acknowledge that the Cranbrook Plan does not allocate development in excess of the Local Plan allocation at Cranbrook and that the SA/SEA of the Cranbrook Plan can draw on the SA/SEA of the overarching Local Plan. The proposed approach to the Cranbrook Plan's SA/SEA, as set out in the Scoping Letter, will meet the SA/SEA requirements in terms of methodology, relevant policy context, baseline information, key environmental and sustainability issues and SA Framework. **The HRA of the Cranbrook Plan** We agree with your assertion that, as the Cranbrook Plan allocations remain within the Local Plan allocations, the conclusions of the Local Plan's HRA can	Noted, no action required.

Consultee	Response	LUCs response
	apply to the Cranbrook Plan. We acknowledge that additional work was undertaken on the HRA and the wording of the Local Plan, to address our concerns as set out in our earlier HRA consultation response dated 11 June 2015. We also acknowledge that the revised versions of the Local Plan and the HRA were submitted for Examination as shown on the EDDC website. We are satisfied that the Local Plan as it currently stands accords with the Habitats Regulations, and that a separate HRA of the Cranbrook Plan is not necessary. If any significant changes to the Local Plan are made however, this position will need to be reviewed.	
Environment Agency	We are satisfied with the proposed scope of the SEA. The contents of the scoping letter and the SEA framework recognise most of the key environmental issues of relevance to us like ensuring no increase in flood risk, the maintenance and enhancement of water quality, the conservation and enhancement of biodiversity and the waste management. Nonetheless we would recommend that the SEA makes specific reference to the objectives of the Water Framework Directive and includes priority habitats and species when considering biodiversity impacts.	Noted. The Water Framework Directive is now referred to in the review of plans, policies and programmes (see review in **Chapter 3**). Options for the Cranbrook Plan will be appraised against SA objective 11 which considers impacts on biodiversity, including priority habitats and species.
David Lock Associates	**SA Scoping** It is agreed that the Cranbrook Plan DPD, and the SA process related to it, has a narrow scope. This arises in part as the DPD and its SA is prepared in the context of an overarching Sustainability Appraisal for the East Devon New Local Plan. Equally, in the formulation of options, the scope is narrowly defined by the East Devon Local Plan which is now at an advanced stage and which explicitly provides for the further expansion/intensification of Cranbrook to accommodate the additional houses and other related facilities proposed in the Cranbrook Plan Area, outside the designated Neighbourhood Plan Areas of Rockbeare, Broadclyst and Clyst Honiton. **Baseline Information** Your Scoping letter sets out some of the sources of such information and summarises some of that information. The baseline information should also	Noted. The baseline information has been amended to include details of the proposed expansion of Cranbrook (see **Chapter 3**). It is recognised that options in the Cranbrook Plan may offer opportunities for landscape enhancement as well as the mitigation of negative impacts and this will be addressed in the SA as appropriate. The SA framework includes objectives relating to housing, employment and services and facilities, against which options for the Cranbrook Plan are being assessed, and consideration is being given to the need to achieve a balance

Consultee	Response	LUCs response
	make reference and draw from the application material that supports the present applications for the expansion of Cranbrook (15/00045-47/OUT). **Key Environmental and Sustainability Issues** It is agreed that many of the key sustainability issues will be the same as the rest of the District. As to those issues set out in your letter I would make the following comment: • the reference to the need to ensure that large scale new development being appropriate and integrated into the landscape and respecting character should be expanded to include consideration of the opportunities for landscape enhancements – including significant new planting. It should also recognise that landscape impacts of development can be positive. • the reference to biodiversity appears to be inconsistent with that in paragraph 10 of the Scoping letter. It is agreed that para 10 is the appropriate approach. • considerable care is needed in considering the issue of the conservation of the setting of the listed buildings at such a high level. The design of Cranbrook to date has shown that the setting of listed buildings has been appropriately and satisfactorily addressed through the detailed design process. Considerable care also needs to be exercised in considering an issue of balancing residential opportunities with employment and services and facilities. As was set out in our representations on the scope of the DPD, such issues must be considered on the basis of the fundamental planning philosophy of Cranbrook - in particular the close synergistic relationships between Cranbrook, Skypark, the Airport and other developments - and not as a standalone development. NB: Nick sent additional email containing previous scoping comments	between the provision of housing and supporting infrastructure.
David Lock Associates	**Assessment methodology for the Cranbrook Plan**	Noted. It is inevitable that some of the impacts of development cannot be determined at this level of assessment and

Consultee	Response	LUCs response
	There are, however, a number of important points that the SA/SEA must take into account in assessing options against the environmental and sustainability objectives set out in the methodology. First the assessment can only be at a high level. Hence the conclusions drawn at that level must not prejudge the opportunity to draw conclusions based on more detailed designs at a later stage of the master plan process or more detailed technical work being conducted as part of the DPD and/or application process. For instance drawing conclusions on the setting of listed buildings is likely to be inappropriate given the level of assessment and information available to the SA. Such judgements can only be formed with more certainty on the basis of more detailed assessments and design. Second recognition should be given to the opportunity through further design development to deliver substantial positive outcomes and/or to mitigate the impacts of development. Outcomes at this SA stage should not prejudge that more detailed design process. For instance there is substantial potential through design to deliver landscape enhancements. The positive opportunities arising from development (including at later design stages) should be fully reflected in the assessment an also the positive opportunities for mitigation. With regard to the consideration of options, the SA for the Plan should not seek to prejudge outcomes or options being considered through other means. One such example would be the consideration in relation to gypsy and traveller provision that are to be considered in the District Wide Gypsy and Traveller DPD.	where appropriate the SA will refer to effects being uncertain depending on factors such as the detailed design of development that eventually comes forward. It will also be recognised that high quality design can have positive effects on the landscape and built environment, as well as mitigating potential negative effects.
Network Rail	In relation to the issues contained in your letter, NR's is primarily concerned with the provision of an effective and sustainable public transport system. This is compatible with the objective of avoiding high levels of car use by promoting and encouraging non-car based modes of transport. NR therefore welcome the inclusion of this objective.	Noted. As already described in this table above, an additional key sustainability issue relating to the need to consider the impacts of new development on the transport network has been included (see **Table 3.1** of this report).

Consultee	Response	LUCs response
	In relation to the "Key Environment and Sustainable Issues" listed in the scoping letter, NR are of the view that in addition to ensuring that new large-scale development is appropriately integrated into the landscape and, where possible, respecting and enhancing local character, the scoping of the EA should also ensure that new development is integrated in such way that it does not compromise or disrupt the provision of existing sustainable services. For example NR have already made a representation to the Draft Cranbrook DPD that any new development that may increase traffic at a nearby level crossing sited to the east of the settlement would not only have implications for safety at the level crossing but, as a result of increased patronage, may force NR to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using the crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. Clearly, such a negative impact on rail services resulting from new development that is poorly integrated would be contrary to other key environmental and sustainable issues listed in the scoping letter such as the need to avoid high levels of car use. It would also be contrary to "SA Objective 12" which seeks to promote and encourage non-car based modes of transport.	
Paul Smith	The protection of environment and habitat, is clearly one of the central issues surrounding the ongoing development of Cranbrook, and subject to both UK and EU directive. However it will be necessary for the exercise of a fine balance of conflicting interest to ensure a sustainability of development incorporating adequate infrastructure to maximise the well - being and healthy life style of all residents. In addition to Town based recreational facilities, Cranbrook must be considered in the context of its connectivity to surrounding parishes, and policies adopted which encourage a healthy life style. Amongst other infrastructure this will entail provision of safe cycle/walking routes throughout, usable by all communities, providing improved access to countryside facility but also communication.	Noted. The likely effects of proposals in the Cranbrook Plan on health and sustainable transport are being assessed through the appraisal of options against SA objectives 4: health and 12: sustainable transport.

Consultee	Response	LUCs response
	Whilst faced with an ever diminishing budget, I note that since 2013 Local Authorities have been made responsible for public health issues as part of health and social care reforms. I note that Cranbrook has the potential to be selected as a 'healthy lifestyle Town' following comments made by Simon Stephens head of NHS England. I am unclear as to the potential for funding benefits, but It will be imperative that EDDC works closely with all partners if this proposal is to be realised to optimum benefit. Finally, whilst the arrival of a rail service and improving bus services will ensure swifter and more flexible travel, it is clear that whilst daily usage maybe reduced, rural residents will not part with their vehicular transport because of the complete freedom of movement it enables. Many residents of Cranbrook and surrounding area travel to employment considerably further afield than Exeter. It is therefore essential that this reality continues to be acknowledged by planners and informs decisions re parking provision both on and off road. Inadequate parking and road widths were acknowledged at phase 1 of Cranbrook, however these issues have to a larger extent been addressed during the building of phase 2. This ongoing consideration should prevail during further build out of the Town.	
Equality and Human Rights Commission	Please be advised that the Commission receives many notices and requests to comment on planning issues. We do not have the resources to respond to all, and it is not our practice to respond to consultations on local planning projects. As you may be aware, Local Planning Authorities and other public authorities, in the planning process are subject to the Public Sector Equality Duty (PSED) and are usually better placed than the Commission is to understand the context of planning projects. Therefore, we would request you do not send us further information on this project, unless there is a clear and specific equality and human rights concern you wish to raise (for example, impact on minority communities such as BME groups, or on accessibility for disabled people) where we may be able to add value or if you are uncertain about how the PSED may apply in the decision-making process. As the regulator for the PSED, we may be able to assist.	Noted, no action required.

Consultee	Response	LUCs response
South West Water	Kate regarding Cranbrook South West Water has no concerns with regard to the phases currently under construction/with the benefit of planning permission. We have already been consulted by East Devon District Council regarding the 3 further expansion areas and again have no concerns in respect of our interests.	Noted, no action required.

Appendix 3 Assessment of Cranbrook net residential densities - Summer 2017

An assessment has been undertaken of net residential density levels of dwellings built and registered for Council tax paying purposes at Cranbrook. The work was undertaken in the summer of 2017 and involved defining net developed areas on a map and recording the Council Tax banded dwellings that fall in the defined areas.

The map of the following page shows the identified areas that were recorded and interrogated. Most of the recorded areas shown in red have been fully built-out and it was comparatively straight forward to define boundaries around them. In some case, notably areas 8 and 9, there was adjoining ongoing development and a best case fit was used to define the red line to encompass contained areas of completed development (measured by council Tax banded properties). The areas shown are for the most part of a similar size range to the proposed housing development areas (the brown coloured in areas) on the Cranbrook Masterplan.

It is stressed that the map over the page shows an interpretation of **net development areas**. For this work net area were defined as encompassing:

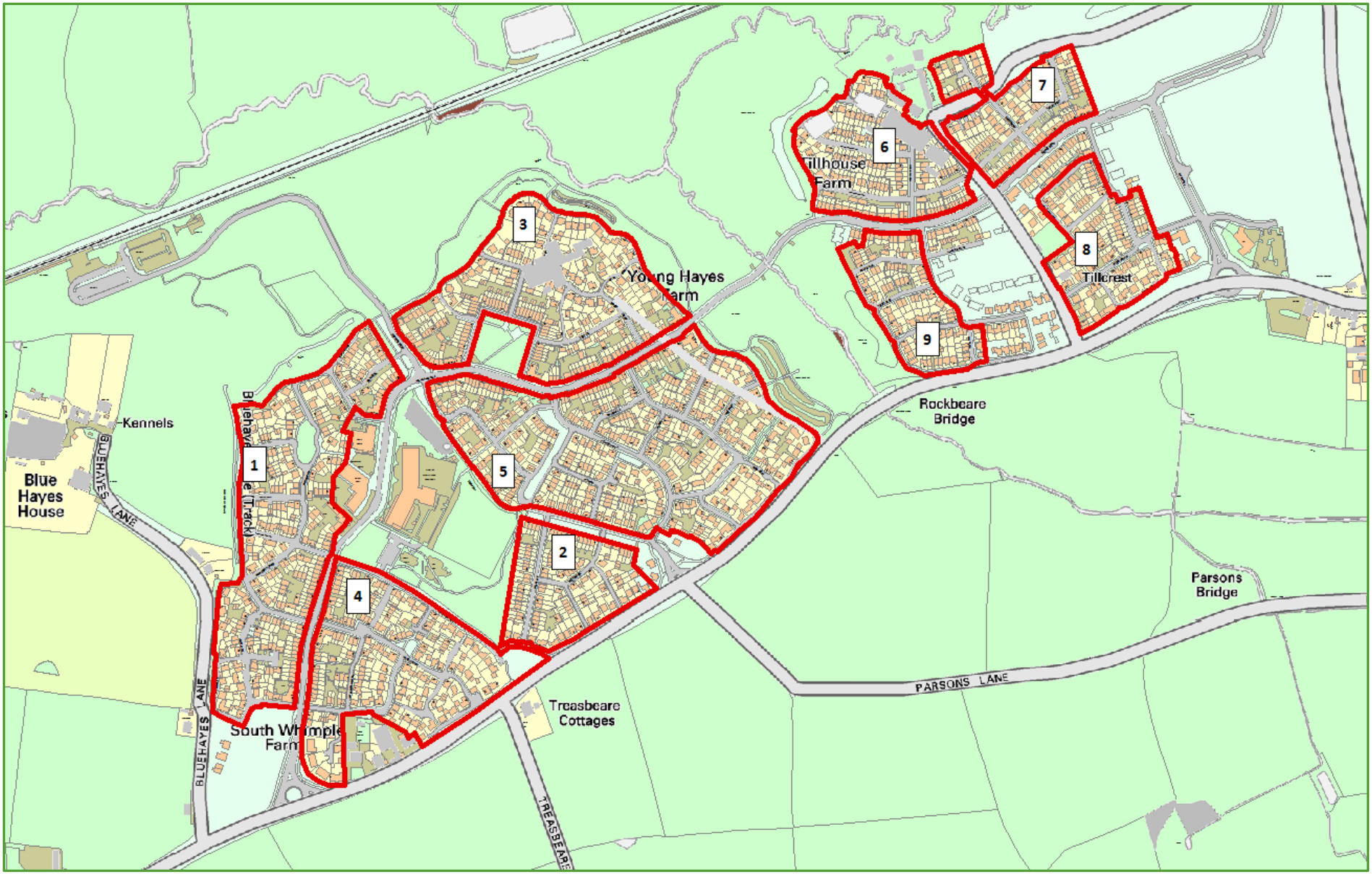
- houses and gardens;
- car parking courts
- estate roads and footpaths;
- incidental open space – including small play spaces and other local green spaces.

The net areas exclude larger scale, strategic and non-residential features such as strategic highways and access roads, major landscaping areas and parkland, playing fields, schools, community and businesses uses and larger scale play areas.

The table below shows the area by reference number, their sizes, housing numbers in them and net density. The recorded net density levels for existing development at Cranbrook ranged from 35.4 dwellings to the hectare to 48.2 with an average level of 42.3.

Area Number	Area Size – in Hectares	Number of Council Tax Banded Homes	Density – Homes/Hectare
1	5.58	245	43.91
2	2.04	96	47.06
3	4.79	203	42.38
4	4.32	153	35.42
5	7.97	332	41.66
6	2.80	135	48.21
7	1.94	86	44.33
8	2.20	84	38.18
9	1.80	79	43.89
Total	**33.44**	**1,413**	**42.25**

Plan of Cranbrook Showing Areas Assessed to Calculate Net Density Levels



Sustainability Appraisal of the Cranbrook Plan

Prepared By:

Planning Policy Section – East Devon District Council